

From: [Ponak, Rich](#)
To: [Convery, Christine](#)
Subject: FW: Lead and asbestos at Ardmore Elementary school
Date: Wednesday, January 21, 2015 2:50:10 PM
Attachments: [ATT00001.txt](#)
[ATT00002.txt](#)
[ATT00003.txt](#)
[ATT00004.txt](#)
[ATT00005.txt](#)
[ATT00006.txt](#)
[ATT00007.txt](#)

Was this District one of your cases? Could you please take a look at this .

Thanks, Rich

-----Original Message-----

From: sandraliz_o@yahoo.com [mailto:sandraliz_o@yahoo.com]
Sent: Tuesday, January 13, 2015 7:04 PM
To: Ponak, Rich
Subject: Lead and asbestos at Ardmore Elementary school

Good evening. I'm not sure if you are the person to speak with but perhaps you can point me in the right direction. There are cracked asbestos tiles in my children's school. According to the red book these tiles were supposed to be replaced in 1999. The schools environmental officer Mr. Dallas claims these tiles are not a risk. The tiles are asbestos and they are cracked. The school did some patch up work over the winter break but cracked tiles still remain. We need help. Our children are being exposed. This is an elementary school. There are young innocent children. We are also dealing with high levels of lead in the water. They tested the water in November 2014. We have the detailed report and can provide you with a copy. Please help us. I have a 5 and 7 year old attending this school; Ardmore Elementary School in Prince George's County Maryland.

Sincerely,
Sandaliz Olive

From: [Convery, Christine](#)
To: [Olive, Keith D.](#)
Subject: RE: Lead and asbestos at Ardmore Elementary school
Date: Thursday, January 29, 2015 9:43:00 AM

I received your email, thank you. I'm looking into everything and collecting necessary records for review.

I also spoke with our water folks and they told me they received your call about lead in water and referred it to Maryland. I also spoke with the Maryland Point of contact, Nancy (last name is escaping me and I'm not in my office right now).

Christine Convery
Compliance and Enforcement Officer
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: 215-814-2249

From: Olive, Keith D. [mailto:kolive@gpo.gov]
Sent: Thursday, January 29, 2015 9:34 AM
To: Convery, Christine
Subject: RE: Lead and asbestos at Ardmore Elementary school

Christine,

Thank you for speaking with me the other day. I sent the information as we discussed and apologize for the rants included in the letter to the state school board. Please let me know if you received everything and I will contact you in a month to check on the status.

Thanks again,

Keith D. Olive | *Special Agent* | Government Printing Office, Office of Inspector General | **ph** [202.512.2275](tel:202.512.2275) | **mb** [202.207.7059](tel:202.207.7059) | **fax** [202.512.1352](tel:202.512.1352) | kolive@gpo.gov

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Find Government information <http://www.fdsys.gov> | <http://bookstore.gpo.gov> | <http://govbooktalk.gpo.gov>

From: Sandraliz [mailto:sandraliz_o@yahoo.com]
Sent: January 21, 2015 03:42 PM
To: Olive, Keith D.
Subject: FW: Lead and asbestos at Ardmore Elementary school

From: [Convery, Christine](#)

Sent: 1/21/2015 3:15 PM

To: sandraliz_o@yahoo.com

Subject: RE: Lead and asbestos at Ardmore Elementary school

Hello Ms. Olive,

Rich Ponak forwarded your message along to me. I am an asbestos enforcement officer and I can look into your concern. Before I contact the school, can you please let me know exactly what Mr. Dallas has told you. Did he state that the particular tiles did not contain asbestos? Or did he state that they contain asbestos but he does not feel they are a risk? I just want to hear your side of the story before I talk to him.

Thank you for contacting EPA about your concern.

Sincerely,
Christine

Christine Convery
Compliance and Enforcement Officer
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: 215-814-2249

-----Original Message-----

From: sandraliz_o@yahoo.com [mailto:sandraliz_o@yahoo.com]

Sent: Tuesday, January 13, 2015 7:04 PM

To: Ponak, Rich

Subject: Lead and asbestos at Ardmore Elementary school

Good evening. I'm not sure if you are the person to speak with but perhaps you can point me in the right direction. There are cracked asbestos tiles in my children's school. According to the red book these tiles were supposed to be replaced in 1999. The schools environmental officer Mr. Dallas claims these tiles are not a risk. The tiles are asbestos and they are cracked. The school did some patch up work over the winter break but cracked tiles still remain. We need help. Our children are being exposed. This is an elementary school. There are young innocent children. We are also dealing with high levels of lead in the water. They tested the water in November 2014. We have the detailed report and can provide you with a copy. Please help us. I have a 5 and 7 year old attending this school; Ardmore Elementary School in Prince George's County Maryland.

Sincerely,
Sandraliz Olive

**ORDER FOR DOCUMENTS TO BE SENT TO EPA FROM AHERA SCHOOL
INSPECTIONS COMPLETED**

- ☐ Memorandum to schools
- ☐ TSCA/AHERA Environmental Efficiency Data Form
- ☐ EPA Inspection Conclusion Data Sheet (ICDS) Form
- ☐ TSCA Inspection/Summary of Observations
- ☐ EPA- Notice of Inspection Form
- ☐ EPA-Receipt for Samples and Documents Form
- ☐ AHERA Compliance Inspection Forms
- ☐ Page 4- LEA SECTION/Management Plans inspection forms that includes **ALL** information gather from school inspection

[NOTE: Be sure to place all management plan data that have an **asterisk** **BEHIND** the EPA form(s).]



MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard • Baltimore MD 21230
410-537-3000 • 1-800-633-6101 • www.mde.maryland.gov

Lawrence J. Hogan, Jr.
Governor

Boyd K. Rutherford
Lieutenant Governor

Ben Grumbles
Acting Secretary

MEMORANDUM

TO: Lorraine Anderson, Chief, Asbestos Division
FROM: Mike Sweeney, REHS, ALCM, ARM Industrial Hygienist III
DATE: Feb 6, 2015
RE: AHERA – Ardmore E.S.

On Jan 30th, 2015 I conducted an inspection of Ardmore Elementary School, Springfield Prince Georges County, MD. I was accompanied on the review of the management plan and walk through inspection of the facility by Alex Baylor / Rodeny Curtis assignees of the Asbestos Designated Person William Dallas and David Carter the Building Supervisor of the local school.

- The LEA appears to be in non-compliance with AHERA, Federal and State regulations as follows:

LEA failed to develop a management plan pursuant to 40 CFR part 763 – plans were not updated to reflect current physical assessment conditions

LEA failed to maintain required records – for those items of non-compliance

LEA failed to assure proper compliance of response actions : 12/23/14 to 1/4/15 floor tile response action
Other response actions were warranted
(details in the attachment)

LEA failed to qualify for and exclusion when eligible for one: 1999 Blue Wing Addition
2000 Modular classroom

Other: LEA failure to sample or assume: vinyl base cove moldings-mastics, veneers & cores of folding partition walls (other), stainless steel sink undercoatings, rope & woven gasketing- Hurst Boilers, navy-stage curtain (multipurpose room)

Min of 3 ceiling plasters samples needed : one for each wing and 1959 original bldg (only one sample)

No asbestos Caution label on /immed adjacent to mudded joint master or main valve (Storage 3 & 4)

The inspection report is enclosed for your review. If you have any questions, please feel free to contact me directly on extension 4115

JMS/jms
Enclosures& Attachment



TSCA / AHERA ENVIRONMENTAL EFFICIENCY DATA FORM

Inspection Date: 1-30-15

Inspector Name: J. Michael Sweeper (4237)

NESHAP Inspection: Yes _____ No ☒ (Check one)

School (Site) Name: Ardmore Elementary School - Prince Georges Co. Public Schools

Address: 9301 Ardwick - Ardmore Rd.

City: Springdale Maryland.

Zip Code: 20744 Site County: Prince Georges County, MD.

SN of the Schools: 0% Not Title I funded.
(Title 1 %)

(Check One) High _____ Medium High _____ Medium ☒
(ECI) Medium Low _____ Low _____

School District (Name of City): Springdale, Maryland

Poverty % of School District: N/A.
(Title 1 %) Not Title I funded.

No. of Students: 541 No. of Staff: 60-62

EPA INSPECTION CONCLUSION DATA SHEET (ICDS) FORM

Number of days physically conducting activity: 1 day or

Number of hours physically conducting activity: 2.5 hrs

Compliance Monitoring Action Outcome: Available Monitoring Action

Check One:

More than one

☐ Immediately Corrected

☐ No compliance monitoring (access denied)

☒ No violations

☐ No compliance monitoring (facility shut down)

☒ Under review

☒ No immediately corrected

Did you observe deficiencies (potential violations) during the on-site inspection?

Yes ☒ If yes, you must answer the following two questions

No ☐ If no, you cannot answer the following two questions

Deficiencies:

Available Deficiency

Check One:

More than one

☒ Potential excess emission in violation of regulations

☒ Potential failure to complete or submit a notification, report, certification, or manifest

☒ Potential failure to follow a permit condition(s)

☒ Potential failure to follow a required sample monitoring procedure or lab procedure

☒ Potential failure to follow or develop a required mgmt practice or procedure

☒ Potential failure to identify and manage a regulated waste or pollutant in any media

☒ Potential failure to maintain a record or failure to disclose a document

☒ Potential failure to maintain/inspect/repair meters, sensors and recording equipment

☒ Potential failure to obtain a permit, product approval, or certification

☒ Potential failure to report regulated events such as spills, accidents, etc.

☒ Potential incorrect use of material (pesticides, waste products) or use of unapproved material

☒ Potential violations of a compliance schedule in an enforceable order

☒ Cristine Conberry EPA REG III

If you observed deficiencies, did you communicate them to the facility during the inspection?

☒ Yes. If yes, you must answer the next question

☐ No. In no, you cannot answer the next question

If yes, what actions were taken:

Available Actions Taken

Check One:

Two or more

☒ Complete(d) a Notification or Report

☒ Corrected Monitoring Deficiencies

☒ Implemented New or Improved Management Practice or Procedures

☐ Improved Pollutant Identification (e.g., Use Reduction, Indstrl Process Change, Emissions or

Discharge change, etc.)

☐ Request(ed) a Permit Application or Applied for a Permit

☐ Verified Compliance with Previously Issued Enforcement Action-Part or all Conditions

Did you provide general compliance assistance in accordance with the policy on the Role of Compliance

Assistance during inspections? ☒ Yes ☐ No

Did you provide site-specific compliance assistance in accordance with the policy of the Role of providing

Compliance Assistance during inspections? ☒ Yes ☐ No

Summary Comments: Enter any comments relevant to this inspection. (Not a mandatory field.)

LEA Prince Georges County Schools, School: Prince Georges County, MD. Public Schools



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

TSCA Inspection
Summary of Observations

Name and Address of Inspector J. Michael Sweeney REITS, ALAN SEN MTR/SENA/1414A SUITE 725 1800 WASHINGTON BLVD BALTIMORE, MD. 21230-1720	Name and Address of Facility Armore Elementary School 9301 Ardwick - Armore Rd. Springdale, MD 20774
Name of Individual to Whom Notice is Given William A. Dillits	Chief Executive Officer of Firm MS. GEORGETTE GREGORY
Title Designated Person	Title Principal of the School
Date 12/15/15	Address 9301 Ardwick - Armore Rd. Springdale MD. 20774

The following potential deviations from the requirements of the Toxic Substances Control Act and regulations promulgated thereto were observed during this inspection:

- ☒ No LEA APPEARS to be in compliance with AHERA.
- ☒ LEA failed to conduct an AHERA inspection or reinspection pursuant to 40 CFR part 763.
- ☒ LEA failed to develop a management plan pursuant to 40 CFR part 763. — plans NOT updated to reflect current phys cond's.
- ☒ LEA knowingly submitted false information to Governor regarding the inspection report.
- ☒ LEA carried out removal/renovation activities while operating under a deferral (EPA issue).
- ☒ LEA knowingly submitted false information to the Governor regarding the deferral request.
- ☒ LEA failed to use accredited persons.
- ☒ LEA failed to provide initial or annual notifications to parents/teachers/employee organizations.
- ☒ LEA failed to notify short term workers.
- ☒ LEA failed to conduct periodic surveillance.
- ☒ LEA failed to maintain required records.
- ☒ LEA failed to ensure proper compliance of response action. for items of non-compliance
- ☒ LEA failed to provide training for the designated person, custodial or maintenance staff. 12/23/14 to 1/4/15 Response action
- ☒ LEA failed to post warnings
- ☒ LEA failed to qualify for an AHERA exclusion and

Other: failure to sample or assume suspect ACBMS. AS follows: see additional details

This Summary of Observations is provided to bring to your attention those areas of concerns at the earliest possible time. It is not intended to be a complete list of potential deviations from the requirements of the Toxic Substances Control Act and regulations thereto, but rather a list of those conditions of immediate concern and/or those readily apparent.

The undersigned acknowledges having received and read a copy of this TSCA Summary of Observations.

Signature <i>[Signature]</i>	Title Environmental Officer	Date 1-30-15
Signature of Inspector J. Michael Sweeney, REITS, ALAN SEN	Title of Inspector INDUSTRIAL HYGIENIST III	Date 1-30-15

My signature in no means an acknowledgment that we agree with
Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.

Customer Service Hotline: 1-800-438-2474

Mr. Sweeney's findings, etc.

School name, address, & phone:

Ardmore Elementary School
9301 Ardwick-Ardmore Rd.
Springdale, MD 20774

Additional Details
TSCA Inspection, Summary of Observations

1. LEA appears to be in compliance with AHERA: _____ N/A _____

2. LEA failed to develop a management plan pursuant to 40 CFR part 763 – Plans were not updated to reflect current physical assessment conditions

3. LEA failed to perform re-inspections pursuant to 40 CFR part 763 OK

4. LEA failed to use accredited persons OK

5. LEA failed to provide initial or annual notifications to parents/teachers/employee organizations: OK

6. LEA failed to notify short term workers: OK

7. LEA failed to perform / document proper periodic surveillance: OK

8. LEA failed to maintain required records: Exclusion package for Blue Wing and one modular classroom and most recent response action records were not part of or integrated into the LS's Management Plan

9. LEA failed to ensure proper compliance of response actions
____ 12/22/14 to 1/4/15 response action of 9"x9" VAT and mastic removal affecting K-1, Rm 34_ and Library corridor only through breezeway back to 1965 wing not available (pre- requested) or at LS within 30 days of its completion _____

Chipped or missing 9" x 9" VAT in RMS 23, 28, 35
4' linear settling fracture in 9" x 9" VAT RM 26

10. LEA failed to provide minimum training OK

11. LEA failed to post warnings OK-Boiler Rm
dr. _____

12. The LEA failed to qualify for an exclusion when eligible for same : Exclusion packages, notably A & E's statement on letterhead : construction free of ACMs for 2000 modular and 1999 Blue wing

13.

Other : Failure to sample or assume 3" black, brown, beige and 4" navy blue vinyl base cove moldings-mastics

Veneer and cores of folding partition walls 30-32, & 24-26

Stainless steel sink undercoatings

Rope and woven gasketing on two Hurst Boilers (greater possibility of these being ceramic fiber)

Navy stage curtain, Multipurpose room

Insufficient number of plaster ceiling samples (minimum of 3 for each wing addition to 1959 original building)



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME <i>Ardenmore Elementary School</i>	
DATE <i>1-30-15</i>	INSPECTION NO. <i>4237</i>	DAILY SEQ. NO. <i>01-15</i>	PRINCE GEORGES COUNTY Public Schools	
2. INSPECTOR'S ADDRESS <i>J.M. Sweeney, P.E. Mid-Continent Area Div. 1800 Washington Blvd, Ste 725 Baltimore, MD 21230-1720</i>			4. FACILITY ADDRESS <i>9301 Ardwick - Ardenmore Rd. Springdale, MD 20774</i>	

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

- | | |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data | <input type="checkbox"/> E. Research data |
| <input type="checkbox"/> C. Pricing data | |

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE <i>J. Michael Sweeney</i>		RECIPIENT'S SIGNATURE <i>William D. Hall</i>	
NAME <i>J. Michael Sweeney</i>		NAME <i>William D. Hall</i>	
TITLE <i>Industrial Hygienist</i>	DATE SIGNED <i>1-30-15</i>	TITLE	DATE SIGNED



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION

DATE 1-30-15
INSPECTION NO. 4237
DAILY SEQ. NO. 15-01

2. COMPANY NAME

Arduene Elementary
School (A PGCPS)

3. INSPECTOR ADDRESS

J. Michael Sweeney
MD/Army Air Force 1800
Washington Blvd. SE 725 Bldg
A12 521230 - 1720

4. COMPANY ADDRESS

9301 Bedwick - Arduene Rd.
Springdale, MD. 20744

For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents and samples of chemical substances and/or mixture described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
1)	School Asbestos Mgmt Plan in entirety MINS Respiratory Protection and Medical Surveillance programs/elements <u>NOT reqd</u>
2)	Notifications
3)	Training ROSTERS - sheet 21th November 16 Apr 04M
4)	Response Action Information
RESPONSE ACTION RECORD 12-23-14 to 1-4-15 Fwd to CHRISTINE CONBERY EPA REG III AHEAD of this compliance inspection. Louis Barkin	

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☒

INSPECTOR SIGNATURE

CLAIMANT SIGNATURE

NAME

NAME

TITLE

DATE SIGNED

TITLE

DATE SIGNED

Industrial Hygienist 1/30/15 Environmental 2/12/2015

Signed by LEA representative

☒ Yes

No (explain)

WM E. Mills

Copy provided to representative

☒ Yes

No (explain)

copy of notice of observations
with findings

OPENING CONFERENCE

LEA representatives present

NAME	TITLE	PHONE #
Alex Baylor (Imp/ PD.)	HQ Maint / Ass't D.P.	cell 301-952-0833
Rodney Curns (IMPR)	" " / Ass't D.P.	240-832-6459
David Carter Bldg Supvr.	Local School	410-302-8665

SCHL 301-925-1311

Conference Questions

- Does LEA have a management plan (MP) for each school building? HP + L.S. ☒ Yes ☐ No
- Does each school have updated copies of MP(s)? No Response ☐ Yes ☒ No
- Amount of ACBM ranges:
9' x 9' floor tile
☒ >3000 square feet or >1000 linear feet ☐ <3000 but >160sqft or <1000 but >260lft ☐ <160sqft or <260lft
- Are parents, teachers, and employee organizations notified of MP's availability & all asbestos activities? ☒ Yes ☒ No
- How often are these notifications and by what medium (news paper, mailers, etc.)?
- Does the LEA perform surveillance on the ACBM's condition in each school? ☒ Yes ☐ No
- How often? 6 mos
- Are school buildings reinspected? ☒ Yes ☐ No
- How often? 3 yrs.
- What training has the designated person received? EPA D.P. self study 100%?
ANGELA IMP-R PD / Supr.
- Are there records to support this? ☒ Yes ☐ No
- Who of the LEA's maintenance staff received training and what type? Bldg supvr + essential
staff have all received 2 hr awareness training
- Where are these records kept? with maint file L.S. / HP
- Have asbestos response actions been performed since 1987? 2 most recent NOT ☒ Yes ☐ No
1 in L.S. file
- Review Record Keeping [40 CFR 763.94...]
Are records for preventative measures & response actions kept in centralized location in the administrative office of both the school & the LEA as part of the MP.
No yes ☒ Yes ☒ No

- Is there a written description of the action taken ~~Separate Records~~ ☒ Not in 1126R w/night Yes ☒ No
- Is there a description of methods used - Not in L.S. records Yes ☒ No
- Location of action given RUS K-1 34 and Library wing Yes ☒ No

Comments:

condition provided as the 50W in most recent R.A. A + I as the asbestos contractor and Tidewater Inc as contracted IH services, provider

Spence E.S. was constructed in 1959 and had six classrooms annexed to original classes 36 + 37 in 1999 K/A the "Blue wing" (blue painted colors selected) Navy Blue VBCM 12x12" tile this addition was eligible for an exclusion - insufficient info in the schools. MGT plan to ascertain whether conditions for the exclusion being met. The school also had spotted one mobile classroom used for pre. classes older new sys < 10 yrs or site according to instructional staff. This school accepts no title to funding and has moderate GC resources.

This inspection was the result of a parental/part time teacher complaint re improper management of asbestos containing floor tile. All response actions were completed or done and time of inspection 1/30/15 10⁰⁰ AM. Most recent R.A. completed over winter break Dec 22 -> Jan 5. Removal of 9'x9" var + mastic underlayment by asbestos abatement firm mentioned on Dec 23 to remove. Instructional staff & school workers were dismissed to Jan 5. Removal of existing 9'x9" var did not occur until after 11/23.

The entire floor plan of the school was surveyed only one 3-4' linear reserve was observed. Chips + fragments missing from about 6 tiles total. 90% of 9" x 9" VAO in good condition and being subject to an asbestos abatement plan. As well as periodic inspection (6 mos) + 3 yr AHERA reinspection.

Inspector's signature:

[Handwritten Signature]

Date:

1/30/15

School Name:

PGCPS/ARDMORE
Elementary School

LEA:

PGCPS

Date of Inspection:

1/30/15

SCHOOL INSPECTION

School Name & address:

ARDMORE Elementary School
9301 Ardwick - Ardmore Rd.
Springdale, MD. 20744

Principal:

Phone #:

Number of occupants?

Students: 541

Employees: 60-62

If school building(s) leased, list the owner's name and address:

William E. Dallas

Contact person:

"Bill" Dallas

PGCPS - Maint Div.

Phone#:

(301) 952-6539

ESQ office

Bldg # 20-1-08

Total number of buildings

3

Grades(i.e., k, k-12)

pre K, K-6

Building	Construction date	Incl. in MP		If no. Date first used as a school
		Y	N	
Wings I + II	1965 + 1967			1966 + 1968
Main Educ. Bldg + Admin Wing	1959	✓		1960
The Blue wing - annex	1999			2000
Modular located on site 10 yrs (2005)			✓	No final insp at electrical panel

Location of MP:

Administrative offices of Local School

MANAGEMENT PLAN INFORMATION

Is Management Plan available?

Yes

No(explain)

Does Not Contain

Response across Intrusion

Date of MP:

Company name/address:

WM. E. Dallas - Environmental officer + A.P.
PGCPS - Facilities Maint Div
* ESQ office Upper Marlboro MD.
Maint Div. - A1424

Date of inspection:

Inspector(s):

12/9/2011 - Baseline (insp./reinsp.)
WM E. Dallas

Accreditation State & No.:

MD. 16199 IMP/R

(List training info

developed by
on back of this sheet)

Person developed by:

Maryland - Cardio - Air p-22.

Accreditation State & No.:

Wm E. Dallas

Accreditation State & No.:

MD 16199 IMP/R

(List training info on back of this sheet)

List training information for all persons involved with inspections and management plan development

1.

What type and amount of Asbestos-Containing Building Material (ACBM) is located in LEA's school building(s) (Obtain copies from management plan)?

9x9 + 12x12 floor tile - more, pipe seen section
added joints. Cemented with layer of lining
wall - 0 Hand-blend rds

School Name: Ardenwood E.S. LEA: P6CPS

2. Are training records for all maintenance and custodial staff included with the MP? Yes No
3. Are state accreditation or training records for all persons involved in major asbestos activities included with the MP? Not as response actions Yes No
4. Are periodic surveillance records included with the MP? Yes No
5. Are periodic surveillance records every 6 mos Yes
6. Are reinspection records included with the MP? Yes No
7. Were samples collected of surfacing materials? 1 Area Not all Yes Yes No me no 1
8. Is Laboratory that performed analysis of bulk sample(s) accredited (NVLAP). ITM Ltd Yes No
9. List the NVLAP accreditation number 1003 AIHA - 408/1990
10. more bulk samples 1205
If yes to question 7, were the appropriate number of samples taken?
3 from each Homogeneous Area $\leq 1,000$ sqft
5 from each Homogeneous Area $> 1,000$ sqft but $< 5,000$ sqft
7 from each Homogeneous Area $> 5,000$ sqft
Yes Yes Yes No No
11. List and or obtain copies from each reinspection performed(use the back of this sheet or separate sheet of paper):
• date of inspection,
• firm name and address,
• inspector(s) name, accreditation state/number, & training information
• management planner's name, accreditation state/number, & training information
Yes Yes Yes Yes Yes
12. Review inspection/reinspections condition assessments for ACBM.
Is any ACBM listed as significantly damaged or damaged? Yes No
13. If yes to question to question 12,
• Did the management planner make recommendations for response actions?
• Did the LEA complete these response actions in the time frame suggested?
• Are there records documenting these response actions?
Yes Yes Yes No No
14. Perform a walk through of each functional space (room/location) that was identified with ACBM. done
15. Verify that response actions address the recommendations of the management planner. Some Yes No

Inspector's signature:

[Handwritten Signature]

Date:

11/30/15

LEA: P6CPS / Ardure E.S.

MANAGEMENT PLANS (Continued)	YES	NO	N/A	REMARKS
(3) For inspection/reinspection under AHERA: <ul style="list-style-type: none"> date of inspection, name/signature, State and number of accreditation of person(s) making inspection * blueprint/description that identifies location and approximate sq/ft footage of homogeneous areas sampled, location of samples, date; homogeneous area of F and NF assumed ACBM in each school building * description of manner used to determine sampling locations, name/signature of person collecting samples, State and number of accreditation bulk sample analyses, name/address of laboratory, statement lab meets requirements, name/signature of analyst description of assessments, name/signature, State and accreditation number of person making assessments list whether homogeneous areas are surfacing, thermal, or miscellaneous material [40 CFR 763.85(a)(4)] 	✓			Multiple things using various methods + ways he to state to assess remaining documents.
(4) Name/address/telephone number of LEA-designated person, course name, dates, hours of training	✓			1459 Need at least 3 different plaster samples only 1 indicated
(5) Recommendations of response actions, name/signature, State and accreditation number of person making recommendations (management planner)	✓			start signed by D.P.
(6) Description of preventive measures/response actions/methods to be used for FACBM, locations, reasons, and schedule for beginning and completing	✓			
(7) For person who inspected for ACBM and who will design and carry out response actions (except O&M), <ul style="list-style-type: none"> statement that person is accredited under State contractor accreditation program, or by an EPA-approved course, OR that LEA will use accredited persons 	✓			Need stamp of D-P. ASSURANCES from MDC *
(8) Description/blueprint of ACBM/assumed ACBM remaining in school after response actions completed				
(9) Plan for reinspection, plan for O&M, plan for periodic surveillance, recommendation of additional cleaning, response of LEA to recommendation, if any. <ul style="list-style-type: none"> for each person who performed periodic surveillance, is a record of date of surveillance, name of person conducting surveillance, and any changes in the condition of the material(s) included [763.94(d)]? 	✓			Abbrev. form in MGMT plan.
(10) Description of steps taken to inform workers, building occupants, regarding inspections, reinspections, response actions, post-response actions, post-response actions planned or in progress *	✓			copies of notification in file & file
(11) Evaluation of resources needed to complete response actions, carry out reinspection, O&M, training	✓			in post closing date
(12) For each consultant who contributed to management plan, statement that person is: <ul style="list-style-type: none"> accredited under State accreditation plan, OR accredited by another State or EPA-approved course 	✓			

LEA: PGCPS / Ardmore E.S.

LEA RESPONSIBILITIES	YES	NO	N/A	REMARKS
LOCATION OF PLAN [40 CFR 763.93(g)(2)] LEA administrative office	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Response Action Records not incl in Mgmt plan.
NOTIFICATION OF PLAN AVAILABILITY [40 CFR 763.93(g)(4)] Annual notification to parent, teacher, employee organization(s); description of steps taken to notify such organization(s); dated copy of notification as part of manage- ment plan *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Annual Notification by letter to parent teacher + staff
DESIGNATED PERSON STATEMENT [40 CFR 763.93(i)] Plan contains statement signed by designated person that general LEA responsibilities have been or will be met	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	copy of form in Inspection file

CLOSING CONFERENCE (to be completed at conclusion of inspections of all schools)

A. Date: 1/30/15 Time: 12:30 Where conducted: Records only insp at L.S.

LEA Representative(s) Present:

Name: ALEX BAYLOR

Title: ASST to D.P.

Name: RODNEY CURTIS

Title: ASST to D.P.

Name: DAVID CARRE

Title: Bldg supv. (Head custodian)

B. Were LEA officials provided copies of:

☒ Receipt for samples and documents

☒ Summary of observations

☒ Updated regulations/guidances (where required)

faxed cover documents
to school for signature
+ return fax
AS SIGNATURE
of ACCEPTANCE

C. Was explanation provided to LEA officials that possible Rule deviations listed on Summary of Observations are not all-inclusive and other rule deviations may be found by EPA during review of the file?

☒ Yes ☐ No ☐ N/A

D. Were LEA officials encouraged to submit proof of rule compliance as soon as possible to the inspector's address?

☒ Yes ☐ No ☐ N/A

E. Were LEA officials informed that documents collected and generated as a result of this inspection are available to parents, the news media, general public, etc., through Freedom of Information Act requests?

☒ Yes ☐ No ☐ N/A

Inspector's Signature: [Signature]

Date of Signature: 1/30/15

Inspector's Signature: [Signature]

Date of Signature: 1/30/15

LEA SECTION

AHERA INSPECTION CHECKLIST

School Name: Asdune E.S. LEA: PGCPS

RESPONSE ACTIONS:

Only to be completed if response action being performed during inspection

Type:

☐ Encapsulation
☐ Enclosure

☒ Removal 9x9" VAT + mastic
☐ Repair

☐ O&M other than short-scale, short duration
☐ Major fiber release

Location of Response Action in school

Building RMS K-1, 34 Floor/Room # Wing 2 Main Corridor + Bridgeway

Type of ACBM: ☐ Surfacing Material ☐ Thermal System Insulation ☒ Miscellaneous

Size of project(square/linear feet): TL 22,666

9x9" VAT +
underlying mastic

Start/completion dates of project: 12/22/14 To 1/5/15

Response Action completed by:

☒ School Employees(if so, at a public school, conduct a separate Worker Protection Inspection)

☒ Contractor(provide company name, address, and telephone number, also list names of supervisors and workers along with their State/accreditation #, expiration date, and if no State/accreditation #, then list name of course provider)

A&I Inc.
8301 B Pulaski Hwy
Baltimore MD 21227
ph 410-238-3020

used chemical peel
needed to remove
mastic
underneath 9x9" VAT

Was air testing performed at the completion of the Response Action

☒ Yes ☐ No

Air monitoring (name of person collecting air samples, company name/address/phone # affiliated with,)

TIGAWARD ENVIRONMENTAL, INC.
6625 Selnick Drive
Elkridge, MD. 21075
ph. 410-776-2865

Air testing project
monitor (11th consultant)

Did person collecting air samples provide their signature. ☒ Yes

☐ No

Date air testing performed 1/5/15

Date air tests analyzed 1/8/15

What type of analysis was performed

☒ TEM ☐ PCM

Name & address of Laboratory that performed the analysis.

I-TEM L.C.
North Lake Commerce Cir.
12850 Middleman Rd. P.O. Box 1060
Greenwood, MD. 20874

PLM analysis
9/2/97 by
Shirley Inc.
P.O. Box 646 Ashaw
Rd. Haverhill MD.
2176

Name of analyst S. Michael J. HENNING

Did analyst provide their signature

Thomas Jones
Suzanne Hurn ☒ Yes

☐ No

Is there a statement that the laboratory meets the applicable requirements of §763.90(i)(2)(ii).

☒ Yes ☐ No

SCHOOL: Arden E.S.LEA: PGCPS

B. TRAINING [40 CFR 763.92(a)...]	YES	NO	N/A	REMARKS
(1) all members of maintenance/custodial staff who may work in building that contains ACBM have received 2-hour awareness training; new employees trained within 60 days of employment	✓			copy of mtr needs certified w/in AMP
(2) maintenance/custodial staff who disturb ACBM have received additional 14-hour training			✓	RAS performed by MD licensed asbestos abatement contractors
C. PERIODIC SURVEILLANCE [40 CFR 763.92(b)]				
- Periodic surveillance conducted at least once every 6 months after plan is in effect				Date of last periodic surveillance 11-14-14
D. WARNING LABELS [40 CFR 763.95...]				
(a) warning labels attached immediately adjacent to F and NF ACBM and assumed ACBM in all routine maintenance areas	✓	✓		I saw no canid
(b) Labels prominently displayed in readily visible locations	✓			(If "NO," was F or NF ACBM present in such areas?) Specify: routine maintenance areas and type of ACBM
(c) Labels read "CAUTION: ASBESTOS. HAZARDOUS. DO NOT DISTURB WITHOUT PROPER TRAINING AND EQUIPMENT."	✓			posted on inside of fire door turn to back
E. OPERATIONS AND MAINTENANCE [40 CFR 763.91...]				
(a) program implemented whenever F ACBM is known or assumed	✓			Complete only if O&M activities have occurred. Otherwise "N/A"
(b) complied with WP Rule (Public Employees only) or complied with Appendix B			✓	MD - MUSH STATE OSHA plan
(c)(2) complied with additional cleaning recommendation, if any	✓			
(d) when O&M activities disturb F ACBM, (Small Scale, Short Duration) (Appendix B)				
- restrict access to maintenance project	✓			pre written prog.
- post signs to prevent entry	✓			
- shut off/modify air handling system(s)	✓			
- use work practices: wet methods, protective clothing, HEPA-vac, mini-enclosures, glove bags [circle practice(s) used as necessary]	✓			
- clean all fixtures in work area	✓			
- place asbestos debris in sealed, leak-tight container	✓			
(f)(1) Minor Fiber Release Episode (< 3 sq/in feet)				
- thoroughly saturate debris-wet asbestos				
- cleaning as described in initial cleaning				
- place asbestos debris in sealed, leak-tight containers				
- repair, or implement appropriate response action				
(f)(2) Major Fiber Release Episode (> 3 sq/in feet)				Complete "Response Action"
- restrict entry	✓			
- shut off/modify air handling system	✓			
- have response action designed and conducted by accredited persons	✓			
F. RECORD KEEPING [40 CFR 763.94...]				
- records kept in administrative office of school				For questions (b)(1) & (2), if no Response Action or preventive measure occurred, no records are required.
(b)(1) for preventive measures & response action				
- written description of action taken	✓			
- methods used	✓			
- location of action	✓			
- reasons for selecting action	✓			

RECORDS A HQ NOT SAME AS L.S.

SCHOOL INSPECTIONS

Cited.

School Name: Arden E.S. LEA: P6CPS

RESPONSE ACTIONS:

Only to be completed if response action being performed during inspection

Type:

☐ Encapsulation
☐ Enclosure

☒ Removal
☐ Repair

☐ O&M other than short-scale, short duration
☐ Major fiber release

Location of Response Action in school

Building RMS K-1, 34

Floor/Room # Wing 2 M.W. Corridor + Bridge

Type of ACBM: ☐ Surfacing Material

☐ Thermal System Insulation

☒ Miscellaneous

Size of project(square/linear feet): (TL 22,666 / wing 2 TL)

9' x 9" VAT +
underlying mastic

Start/completion dates of project: 12/22/14 To 1/5/15

Response Action completed by:

☒ School Employees(if so, at a public school, conduct a separate Worker Protection Inspection)

☒ Contractor(provide company name, address, and telephone number, also list names of supervisors and workers along with their State/accreditation #, expiration date, and if no State/accreditation #, then list name of course provider)

A&I Inc.
8361 B. P. Road, Hwy
Baltimore MD 21227
ph 410-238-3020

Used chemical peel
Applied to remove
mastic
underneath 9' x 9" VAT

Was air testing performed at the completion of the Response Action

☒ Yes

☐ No

Air monitoring (name of person collecting air samples, company name/address/phone # affiliated with,)

TIDWATER ENVIRONMENTAL, INC.

6625 Seltzer Drive

Elkridge, MD. 21075

ph. 410-796-2365

Assigned project
monitor (11th consultant)

Did person collecting air samples provide their signature. ☒ Yes

☐ No

Date air testing performed 1/5/15

Date air tests analyzed 1/8/15

What type of analysis was performed

☒ TEM

☐ PCM

Name & address of Laboratory that performed the analysis.

I-TM LLC
North Lake Commerce Cir.
12850 Middlebrook Rd. P.O. Box 1060
Groesbeek, MD. 20574

PM analysis
7/2/97 by
Shirley Inc.
P.O. Box 646 Ashow
Rd. 11th consultant
21076

Name of analyst S. Michael J. HENNING

Did analyst provide their signature

Thomas Jones
Suzanne Brown

☒ Yes

☐ No

Is there a statement that the laboratory meets the applicable requirements of §763.90(i)(2)(ii).

☒ Yes

☐ No

SCHOOL: Arden E.S. LEA: Prince Georges County Public Schools

PART IX. RESPONSE ACTIONS: Complete separate form for each Response Action documented.

1. Response Action Type:

☐ Encapsulation ☒ Removal ☐ O&M other than small-scale, short duration
☐ Enclosure ☐ Repair ☐ Major Fiber Release

2. Location of Response Action in School (Be Specific)

Building: Rus K-1, 34 + (floor) Location in building: wing 2 main corridor +
Bridge way to wing 1

3. Type of ACBM: ☐ Surfacing ☐ Thermal ☒ Miscellaneous VAT +
MASTIC

4. Size (square/linear feet) of project: 6000 square feet only

5. Start/Completion dates of project: 12/23/14 to 1/4/15

6. Response Action completed by: Occupancy 1/5/15

☐ School Employees (if so, at a Public School, conduct a separate Worker Protection Inspection)

☒ Contractor for removal of 9x9" VAT + Mastic by chemical peel method.

Name: A + I Inc.

Address: 8301 B Pulaski Hwy, Baltimore Md. 21237

Telephone: 410-238-3020

MD Licensed
ASBESTOS
Abatement
Contractor with
good standing

A. LEA/SCHOOL RESPONSIBILITIES	YES	NO	N/A	REMARKS
Designed by accredited persons [763.90(g)] <u>Proj Designer</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(See Worksheet Next Page)
Conducted by accredited persons [763.90(g)] <u>Contractors</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(See Worksheet Next Page)
Initial cleaning accomplished [763.91(c)] (except for O&M and/or repair)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Name: () Employee () Contractor
- HEPA-vac/steam clean all carpets	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
- HEPA-vac/wet-clean all other floors and all other horizontal surfaces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
- dispose of debris, filters, mopheads, cloths, in sealed, leak-tight containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Person (LEA or Contractor) designated to visually inspect (i.e., following a response action) [763.90(l)(1)] <u>classroom monitoring</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	() LEA or () Contractor <u>Tidewater Inc.</u>
Visual inspection conducted [763.90(l)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is an updated and detailed or descriptive blueprint, diagram, etc., included in the MP, indicating where (if any) ACBM or suspected ACBM assumed to be ACM remains in the school once response action completed [763.93(e)(8)]?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mgmt plan not updated to reflect remaining inventories. post response action

RESPONSE ACTIONS

AHERA INSPECTION CHECKLIST

Revised 8/92

WORKSHEET - ACCREDITED PERSONS

(To be used in conjunction with page 13)

PROJECT
DESIGNER

EMPLOYER/
NAME: ADDRESS

STATE/ACCREDITATION NO.
(and name of course provider if
no State Accreditation #)

A + I Abstract Inc. MD.

CONTRACTOR/
SUPERVISOR

A + I Abstract Inc. MD.

LIST NAMES OF
WORKERS

Not available @ L.S + 1 + 2 recds.

This information may not be available at the school, and may have to be obtained through a visit to the contractor, or through written correspondence or subpoena.

Inspector should review sign-in sheets and/or personal daily air monitoring records, to verify number of workers and supervisors and their accreditation numbers.

⇒ EPA
REGION
HI
Christine
Cousensy

RESPONSE ACTIONS

AHERA INSPECTION CHECKLIST
Revised 8/92

SCHOOL: Arden E. S. LEA: Prince Georges County

OTHER PERSON RESPONSIBILITIES

Public Schools

B. ABATEMENT CONTRACTOR

Conducted by accredited workers
(Use worksheet previous page)

Alex Baylor

YES NO N/A

REMARKS

Obtain time sheets of workers on job; workers' AHERA certificates. (LEA is not required to have this, may need to request of contractor)

C. AIR MONITORING CONTRACTOR

Tidewater Inc.

For PCM and TEM

- Air samples collected using aggressive sampling where TEM is to be used (per Appendix A) (not required for small-scale, short duration)
- If PCM is applicable, minimum of 5 samples collected from each functional space
- If TEM is applicable, minimum of 13 samples collected for each functional space

Air monitoring contractor: Tidewater Inc.
Name/Address:

Obtain copies of drawings/diagrams establishing functional spaces

No

Noted for

D. LABORATORY CONTRACTOR

Available data

Based upon T+IS

Air samples analyzed by: [763.90(i)(2)(ii)]

- NIST-accredited lab (TEM)
- Lab used protocol in Appendix A (TEM)
- Lab enrolled in American Industrial Hygiene Association Proficiency Analytical Testing Program (PCM)
- Lab used NIOSH method 7400 (PCM)

Insufficient Bk samples plotted.

E. TEM REPORTING (must provide to client)
Appendix A, Unit II.H

Concentration in μm^2 and μcc

Analytical sensitivity used

Number of asbestos structures

Area analyzed

Volume of air sampled

Copy of count sheet

Signature of lab official that laboratory met all specifications of method

Official lab identification (letterhead)

Type of asbestos

Obtain copy of all final clearance documents

Documents provided to CDE/ISTE Conberry prior to O.C. for T+IS inspection.

RESPONSE ACTIONS

AHERA INSPECTION CHECKLIST

Revised 8/92

AHERA WALK THROUGH INSPECTION FORM
(List material for each of the following)

LEA: PGCPs

SCHOOL: Ardmore E.S.

BUILDING: Original 1959

Room(s): 14	Photo	YES	NO	NEW	N/A	3YR
Ceiling: T-room plaster test neg			X			
Walls:						
Floors: 9"x9" white VAT-mastic and 3" Blk VBCMM*		XX				
Thermal:						

• Under counters and basebd heaters

Room(s): 15	Photo	YES	NO	NEW	N/A	3YR
Ceiling: T-room plaster test neg			X			
Walls:						
Floors: 9"x9" gray VAT-mastic		X				
Thermal:						

Blackboards, original

X

Room(s): 13	Photo	YES	NO	NEW	N/A	3YR
Ceiling: T-room plaster test neg			X			
Walls:						
Floors: 9"x 9" red & mauve VAT and 3"blk VBCMM		XX				
Thermal:						

Blackboards, original

Room(s): 12	Photo	YES	NO	NEW	N/A	3YR
Ceiling: T-room plaster test neg			X			
Walls:						
Floors: 9"x9" red and mauve VAT and 3" blk VBCMM		XX				
Thermal:						

Original blackboards-mastic

x-m

Inspector No. JMS

4237 Date: 1/30/15

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SCHOOL INSPECTION

AHERA INSPECTION CHECKLIST

Formatted 12/06

AHERA WALK THROUGH INSPECTION FORM (List material for each of the following)

LEA: PGCPs

SCHOOL: Ardmore E.S.

BUILDING: Original 1959

Suspect
ACBM Identified in
the Management Plan

Room(s): Curriculum Office (diag: teach & read)	Photo	YES	NO	NEW	N/A	3YR
Ceiling: Test neg			X			
Walls:						
Floors: 9"x9" lt green VAT-mastic		XX				
Misc: 3" blk VBCMM		XX				

Room(s): Storage 3 & 4 grade conf	Photo	YES	NO	NEW	N/A	3YR
Ceiling:						
Walls:						
Floors: 9" x 9" mauve VAT and mastic		XX				
Thermal: 1 mudded joint at the OH master valve		X				

Stainless steel sink undercoating

x

Room(s): 21	Photo	YES	NO	NEW	N/A	3YR
Ceiling:						
Walls:						
Floors: 9" x 9" red and mauve VAT-mastic		XX				
Thermal:						

Misc 3" blk VBCMM-mastic and SS sink undercoating

xx

Room(s): 20-22	Photo	YES	NO	NEW	N/A	3YR
Ceiling:						
Walls: 1 common int folding partition wl (core-insl)		X				
Floors: 9" x 9" red & mauve VAT-mastic		XX				
Thermal:						

Original black-board mastic

x

Inspector No. JMS 4237

Date: 1/30/15

Page 3 of 8

AHERA WALK THROUGH INSPECTION FORM
(List material for each of the following)

LEA: PGCPs
SCHOOL: Ardmore E.S.
BUILDING: 1959 Original

Room(s): K-2	Photo		YES	NO	NEW	N/A	3YR
Ceiling:							
Walls:							
Floors: 9"x9" off white VAT-mastic v-trans strip to ww carpeting - mastic		XXXX					
Thermal: none							

Room(s): 28	Photo		YES	NO	NEW	N/A	3YR
Ceiling:							
Walls:							
Floors: 9"x9" VAT off white-mastic (RAW - 1 chipped 25%loc)		XX					
Thermal: 3 risers all fiberglass (no pipseal obsvd)							
3" blk VBCMM		XX					

Room(s): 25	Photo		YES	NO	NEW	N/A	3YR
Ceiling:							
Walls:							
Floors: 9" x9" crème VAT-mastic		XX					
Thermal:							
3" blk vbcmm and original blacbd mastic		XX					

Room(s): Storage 7	Photo		YES	NO	NEW	N/A	3YR
Ceiling:							
Walls:							
Floors: 9"x 9" off white VAT-mastic		XX					
Thermal: None and no misc.							

Inspector No. JMS 4237

Date: 1/30/15

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SCHOOL INSPECTION

AHERA INSPECTION CHECKLIST

12/06

AHERA WALK THROUGH INSPECTION FORM
(List material for each of the following)

LEA: PGCPS
SCHOOL: Ardmore E.S.
BUILDING: Wing 2, 1967

Suspect
ACBM Identified in
the Management Plan

Room(s): Blue wing annex 1999	Photo		YES	NO	NEW	N/A	3YR
Ceiling: Eligible for exclusion							
Walls:							
Floors: 4" Navy blue VBCMM-mastic in hallways		xx					
Thermal:							

Room(s): Storage 8	Photo		YES	NO	NEW	N/A	3YR
Ceiling:							
Walls:							
Floors: 9" x 9" off white VAT-mastic		xx					
Thermal: 3 fiberglass risers			x				

Room(s): 34	Photo		YES	NO	NEW	N/A	3YR
Ceiling:							
Walls:							
Floors: 12" x12" CT VCT and mastic			x	1/7/15			
Thermal:							

Misc SS sink undercoatings and emergency exit fire door xx

Room(s): 35	Photo		YES	NO	NEW	N/A	3YR
Ceiling:							
Walls:							
Floors: ¼ of row floor tile missing at emergency fire exit dr interface 9" x9" VAT-mastic (RAW)		xx					
Thermal: Misc: SS sink undercoatings		x					

Inspector No. JMS 4237

Date: 1/30/15

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SCHOOL INSPECTION

AHERA INSPECTION

CHECKLISTformatted 12/06



Inspector No. JMS 4237

Date: 1/30/15

Page 8 of

SCHOOL INSPECTION

AHERA INSPECTION CHECKLIST
Formatted 12/06

SCHOOL: Adams E.S. LEA: Prince Georges County Public Schools

PART IX. RESPONSE ACTIONS: Complete separate form for each Response Action documented.

1. Response Action Type:

☐ Encapsulation ☒ Removal ☐ O&M other than small-scale, short duration
☐ Enclosure ☐ Repair ☐ Major Fiber Release

2. Location of Response Action in School (Be Specific)

Building: RUS K-1, 34 + floor Location in building: wing 2 main corridor
adj. library to Bandgym wing 1

3. Type of ACM: ☐ Surfacing ☐ Thermal ☒ Miscellaneous

4. Size (square/linear feet) of project: GUESSTIMATE only VAT + MASTIC

5. Start/Completion dates of project: 12/23/14 to 1/4/15

6. Response Action completed by: Occupancy 1/5/15

☐ School Employees (if so, at a Public School, conduct a separate Worker Protection Inspection)

☒ Contractor for removal of 9x9" VAT + MASTIC by chemical peel method.

Name: A + I Inc.

Address: 8301-B Pulaski Hwy Baltimore MD. 21237

Telephone: 410-283-3020

MD LICENSED
ASBESTOS
ABSTAINED
CONTRACTOR IN
GOOD STANDING

A. LEA/SCHOOL RESPONSIBILITIES

	YES	NO	N/A	REMARKS
Designed by accredited persons [763.90(g)] <u>Proj Designer</u>	<input checked="" type="checkbox"/>			(See Worksheet Next Page)
Conducted by accredited persons [763.90(g)] <u>Contractors</u>	<input checked="" type="checkbox"/>			(See Worksheet Next Page)
Initial cleaning accomplished [763.91(c)] (except for O&M and/or repair)	<input checked="" type="checkbox"/>			Name:
- HEPA-vac/steam clean all carpets	<input checked="" type="checkbox"/>			() Employee () Contractor
- HEPA-vac/wet-clean all other floors and all other horizontal surfaces	<input checked="" type="checkbox"/>			
- dispose of debris, filters, mopheads, cloths, in sealed, leak-tight containers	<input checked="" type="checkbox"/>			
Person (LEA or Contractor) designated to visually inspect (i.e., following a response action) [763.90(l)(1)] <u>classroom moving</u>	<input checked="" type="checkbox"/>			() LEA or () Contractor
Visual inspection conducted [763.90(l)(1)]	<input checked="" type="checkbox"/>			<u>Tidewater Inc.</u>
Is an updated and detailed or descriptive blueprint, diagram, etc., included in the MP, indicating where (if any) ACM or suspected ACM assumed to be ACM remains in the school once response action completed [763.93(e)(8)]?	<input checked="" type="checkbox"/>			<u>Must plan not updated to reflect remaining inventories post response action</u>

RESPONSE ACTIONS

(To be used in conjunction with page 13)

STATE/ACCREDITATION NO.
(and name of course provider if
no State Accreditation #)

A+I Abstract Inc MD

A + I Abstract Inc.	MD
---------------------	----

Not available @ L.S +	179 reads
-----------------------	-----------

\Rightarrow EPA REGION

Christine Convery

ASHERA INSPECTION CHECKLIST

14

SCHOOL: Arden E. S. LEA: Prince Georges County Public Schools

OTHER PERSON RESPONSIBILITIES

B. ABATEMENT CONTRACTOR

Conducted by accredited workers
(Use worksheet previous page)

ALEX BAYLOR

YES NO N/A

REMARKS

☒

Obtain time sheets of workers on job; workers' AHERA certificates. (LEA is not required to have this, may need to request of contractor)

C. AIR MONITORING CONTRACTOR

TIDEWATER INC.

For PCM and TEM

- Air samples collected using aggressive sampling where TEM is to be used (per Appendix A) (not required for small-scale, short duration)
- If PCM is applicable, minimum of 5 samples collected from each functional space
- If TEM is applicable, minimum of 13 samples collected for each functional space

Air monitoring contractor:
Name/Address:

TIDEWATER INC.

Obtain copies of drawings/diagrams establishing functional spaces

NO

referred for

D. LABORATORY CONTRACTOR

Available data

Based upon this

Air samples analyzed by: (763.90)(1)(2)(11)

- NIST-accredited lab (TEM)
- Lab used protocol in Appendix A (TEM)
- Lab enrolled in American Industrial Hygiene Association Proficiency Analytical Testing Program (PCM)
- Lab used NIOSH method 7400 (PCM)

☒

☒

☒

☒

Winchester Bk samples please.

**E. TEM REPORTING (must provide to client)
Appendix A, Unit II.H**

Concentration in s/mm² and s/cc

Analytical sensitivity used

Number of asbestos structures

Area analyzed

Volume of air sampled

Copy of count sheet

Signature of lab official that laboratory met all specifications of method

Official lab identification (letterhead)

Type of asbestos

Obtain copy of all final clearance documents

Documents provided to client prior to o.c. for this inspection.

RESPONSE ACTIONS

Ardmore Elementary

Mike Sweeney (P)
2/24/11

Floor tile

9x9 floor tile in school - lots of it
most in good shape

Floor repairs - saw evidence of removal

DB upset w/ Mike Sweeney b/c he looked
@ everything.

misc. materials

- stainless sink

undercoat

- vinyl base coat
mastics

Mike Sweeney told that
recess were requested
by me & so they were

not
samples

Response letters kept at main office
but he asked if they said that
EPA had requested records so not avail

info
provided

used chemical peel method
who was contractor

they
would
deal
w/ EPA
at recess

Scanned file & sent to ~~Frederick~~

~~Frederick~~ Carletta Parlin

told her that 95% in good cont.

Nakia Ngwale 240 398 0505

she has
it

she seemed happy

(2)

Celling plaster - they had taken only 1 sample

Cafetorium - dark navy curtains

Modular - no mgt plan, no architect
litter
new wing - no x chis.

Boiler room looked good

- One suspect material
- told to keep up signs b/c some gasket suspect & can't assume ☹

Not planning ~~any~~ more inspection's right now.

Main concern is that not all msc. materials not identified.

Not too concerned @ floor tile

(410) 537-4115 direct # @ office
Mike Sweeney.

Cell:

From: [William Dallas](#)
To: [Convery, Christine](#)
Cc: [Ponak, Rich](#); [Carl Belcher](#); [Alex Baylor](#); [Kathryn Munson](#)
Subject: Re: Ardmore Elementary School
Date: Monday, February 02, 2015 2:54:40 PM
Attachments: [Ardmore ES-EPA Inquiry.pdf](#)

Good Afternoon Ms. Convery,

Please find attached the following concerning Ardmore ES:

- Proof of 2011 and 2014 three year re-inspections;
- Proof of the last four periodic surveillances;
- Records of the last three years of response actions (EPA notifications, final clearance results and waste manifests)

If you have any further questions, feel free to contact me.

Sincerely,

--

William E. Dallas, CSP / Environmental Specialist

Prince George's County Public Schools / Division of Supporting Services / Building Services
13306 Old Marlboro Pike, Upper Marlboro, MD 20772
Office Number: 301-952-0831 / Mobile Number 240-832-6459 / Fax Number: 301-952-0346

Email Address: william.dallas@pgcps.org / Website: <http://www1.pgcps.org/environment/>

Note:

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Thank you.

On Tue, Jan 27, 2015 at 9:31 AM, William Dallas <william.dallas@pgcps.org> wrote:

Good Morning Ms. Convery,

We will get those records to your office as soon as possible.

Dallas

On Mon, Jan 26, 2015 at 1:20 PM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Mr. Dallas,

Thanks for speaking with me this morning. Regarding the Ardmore Elementary School, please provide the following in hard copy or PDF/email:

- 1) Two (2) most recent 3-year re-inspections
- 2) Four (4) most recent period surveillance
- 3) Records of response actions for the last 3 years

I left a voicemail for Mike Sweeney with MDE this morning, so I'll be in touch with him soon.

Thank you,

Christine Convery

Compliance and Enforcement Officer

Pesticides and Asbestos Programs Branch (3LC62) | EPA Region 3

1650 Arch Street | Philadelphia, PA 19103

Phone: [215-814-2249](tel:215-814-2249)

--

William E. Dallas, CSP / Environmental Specialist

Prince George's County Public Schools / Division of Supporting Services / Building Services
13306 Old Marlboro Pike, Upper Marlboro, MD 20772

Office Number: [301-952-0831](tel:301-952-0831) / Mobile Number [240-832-6459](tel:240-832-6459) / Fax Number: [301-952-0346](tel:301-952-0346)

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Thank you.

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William E. Dallas, CSP / Environmental Specialist

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13306 Old Marlboro Pike, Upper Marlboro, MD 20772
Office Number: [301-952-0831](tel:301-952-0831) / Mobile Number [240-832-6459](tel:240-832-6459) / Fax Number: [301-952-0346](tel:301-952-0346)

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Thank you.

Inspection Date and Signatures [763.93 (e) 3 § 5]

Building: Ardmore Date: 12/2/14

Inspector(s), sample taking personnel & person making assessments.

The qualified inspector who performed the above function was:

Name: Alex Baylor

Signature: Alex Baylor

State of Accreditation: Maryland

Accreditation Number: 125595 (2014)

Inspection Date and Signatures [763.93 (e) 3 § 5]

Building: Andmore Date: 12/9/2011

Inspector(s), sample taking personnel & person making assessments.

The qualified inspector who performed the above function was:

Name: Alex Baylor

Signature: Alex Baylor

State of Accreditation: Maryland

Accreditation Number: 116200 (2013)



Prince Georges County Public Schools
Division of Supporting Services
Environmental and Safety Office

Six-Month Asbestos Surveillance Report

Building: ARDMORE ES						Cycle:
Type of Material	Location	Description of Damage	Action Code	Physical Assessment	Change in Condition (Yes/No)	Explain
FLOOR 9x9 VAT	Throughout Building	N/A	4	5		
FLOOR 12x12 VAT (tan)	Lobby area	N/A	4	5		
WALL Hard Board	Divider between 20-22	N/A	5	7		
T.S.I. Pipe Insulation	Stage,kitchen Storage rooms	N/A	5	5		
DOOR Fireproof	Boiler Rm and hallways	N/A	4	7		
Cement Board	Library Entrance	N/A	5	7		
T.S.I. Black Pipe Seam Sealant Insulation	Throughout Building	N/A	5	5		

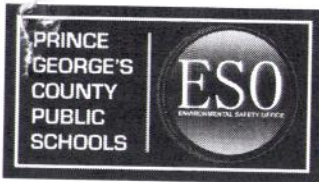
Inspector Signature

Alex Bz

Date:

11/14/14

For Internal Use Only



Prince Georges County Public Schools
Division of Supporting Services
Environmental and Safety Office

Six-Month Asbestos Surveillance Report

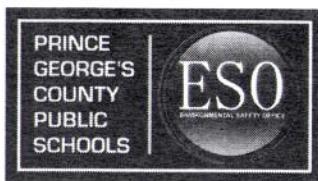
Building: ARDMORE ES						
						Cycle:
Type of Material	Location	Description of Damage	Action Code	Physical Assessment	Change in Condition (Yes/No)	Explain
FLOOR 9x9 VAT	Throughout Building	N/A	4	5		
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DOOR Fireproof	Boiler Rm and hallways	N/A	4	7		
Cement Board	Library Entrance	N/A	5	7		
T.S.I. Black Pipe Seam Sealant Insulation	Throughout Building	N/A	5	5		

Inspector Signature

Alex Bzgh

Date:

4/11/14
For Internal Use Only



Prince Georges County Public Schools
Division of Supporting Services
Environmental and Safety Office

Six-Month Asbestos Surveillance Report

Building: ARDMORE ES						Cycle:
Type of Material	Location	Description of Damage	Action Code	Physical Assessment	Change in Condition (Yes/No)	Explain
FLOOR 9x9 VAT	Throughout Building	N/A	4	5		
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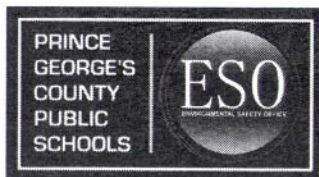
Inspector Signature

Alvin Baker

Date:

11/18/13

For Internal Use Only



Prince Georges County Public Schools
Division of Supporting Services
Environmental and Safety Office

Six-Month Asbestos Surveillance Report

Building: ARDMORE ES						Cycle:
Type of Material	Location	Description of Damage	Action Code	Physical Assessment	Change in Condition (Yes/No)	Explain
FLOOR 9x9 VAT	Throughout Building	N/A	4	5		
FLOOR 12x12 VAT (tan)	Lobby area	N/A	4	5		
WALL Hard Board	Divider between 20-22	N/A	5	7		
T.S.I. Pipe Insulation	Stage,kitchen Storage rooms	N/A	5	5		
DOOR Fireproof	Boiler Rm and hallways	N/A	4	7		

Inspector Signature

Ally Bayler

Date:

4/12/13

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2071278

MD DEPARTMENT OF THE ENVIRONMENT • ASBESTOS LICENSING/ENFORCEMENT DIVISION • ASBESTOS PROJECT NOTIFICATION

1800 Washington Blvd., Suite 725 • BALTIMORE MD 21230-1720

OFFICE USE ONLY →

Notification ID:

Notification Type: (Check one) →

☐ [O] ORIGINAL [First Notice THIS Project]

Resp Agency: S

Original Submit Date: 5/16/11

☒ [R] Revision Revision # 1

Variance Request Attached? (Y/N)

Revision Date: 6/17/11

☐ [P] Postpone →

☐ [R] Reschedule

Received Date: →

[Date of THIS Revision]

☐ [C] Cancel →

☐ [R] Reschedule

Postmark Date: →

If this is a Revision, what are you revising?

☒ Start Date

☒ Complete Date

Initials/Date:

☐ Other (Specify)

☐ Quantity

Type of Project NESHAP → ☒ [N] Renovation ☐ [D-N] Demolition ☐ [D-N] DEMO ONLY (no asbestos)
[Operation]: Non-NESHAP → ☐ [S-N] Renovation ☐ [D-N] Demolition ☐ [S-N] Encapsulation

I. JOB/SITE DATA

Emergency? ☐ Yes ☒ No

Asbestos Present? ☒ Yes ☐ No

Enter PROJECT [Site/Building] NAME below: ↓

Ardmore Elementary School

Street Address: 9301 Ardwick-Ardmore Road

Region: 03

County ID: 16 [From below]

City: Springdale

State: MD

Zip: 20774

01 Allegany	04 Calvert	07 Cecil	10 Frederick	13 Howard	16 Prince George	19 Somerset	22 Wicomico
02 Anne Arundel	05 Caroline	08 Charles	11 Garrett	14 Kent	17 Queen Anne	20 Talbot	23 Worcester
03 Baltimore	06 Carroll	09 Dorchester	12 Harford	15 Montgomery	18 St Mary	21 Washington	24 Baltimore City

Project/Site Location Description: (BE SPECIFIC!...Bldg, Room, Floor # etc.) Miscellaneous Hallways

Building Size: 50000

(SQ FT)

No. Floors: 1

Present/Prior Use: B-Ship, C-Commercial, G-Government, H-Hospital, I-Industrial, O-Office, P-Public Building, R-Residence, S-School, U-University/College, V-Vacant, T-Other

Present Use: S

(LN FT)

Age: 50

Prior Use: S

II. ASBESTOS/PROJECT DATA

Nonfriable Not Removed

Nonfriable Removed

Amount of Asbestos

RACM Removed

CAT I

CAT II

CAT I

CAT II

Unit

Pipes

LnFt

Surface Area

1430

SqFt

Vol Off Fac Component

CuFt

Removal/Encapsulation/Demolition → Start Date: 7/6/11

Completion Date: 7/8/11

of Workers: 5

Project Supervisor: Shawn Morosko

Days Worked: Tues-Thurs

Hours Worked: 6a-4p

III. RESPONSIBLE PARTIES

Describe asbestos (e.g. pipe insulation, boiler breeching, floor tile, etc.)
VAT and Mastic

A. Asbestos Contractor: Asbestos Specialists Inc.

MD License #: M21-13-002

Project Contact: David Purdum

Telephone: 410-796-5379

B. Other [including Demolition] Contractor:

Address:

Contact:

City, State, Zipcode:

Telephone:

C. Owner: Prince Georges County Board of Education

Address: 13300 Old Marlboro Pike

Contact: Dallas Williams

City, State, Zipcode: Upper Marlboro, Maryland 20772

Telephone: 301-952-6500

III. RESPONSIBLE PARTIES *(continued)*

D. **Waste Transporter:** Service Transport Inc.

Address: 58 Pyles Lane

Contact: Randy Bridges

City, State, Zipcode New Castle, Delaware 19720

Telephone: 877-999-9559

E. **Landfill:** Minerva Landfill

Address: 8955 Minerva Road

Contact: Steve Chandler

City, State, Zipcode Waynesburg Ohio 44688

Telephone: 330-866-3435

IV. WORK PRACTICES

A. Procedure, including analytical method, if appropriate, used to detect the presence of asbestos. *(Use additional sheets, if necessary)*

Provided by owner

B. Description of planned demolition, renovation, or encapsulation work and method(s) to be used: *(Use additional sheets, if necessary)*

Partial removal and disposal of asbestos containing floor tile and mastic in (4) hallways and the stage mechanical room. All work in accordance with federal, state and local regulations.

C. Description of work practices and engineering controls to be used to prevent emissions of asbestos at the demolition, renovation and/or encapsulation site: *(Use additional sheets, if necessary)*
Negative pressure enclosure, HEPA vacuums, wet methods, double bag and label waste, half face APR respirators and full body suits, one stage decontamination chamber.

D. EMERGENCY RENOVATIONS: Date and Hours of Emergency: (MM/DD/YY) Time:
Description of the sudden, unexpected event: *(Use additional sheets, if necessary)*

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden: *(Use additional sheets, if necessary)*

E. Description of procedures to be followed in the event that unexpected asbestos is found or previously nonfriable asbestos material becomes crumbled, pulverized, or reduced to powder. *(Use additional sheets, if necessary)*
Work area will be contained, HEPA vacuum and wet clean the area until visibly clean, perform and pass clearance air sampling prior to reoccupation.

F. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING THE DEMOLITION, RENOVATION OR ENCAPSULATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS.

Signature

Date

G. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.

Signature

Date

H. IN ADDITION TO THE INFORMATION REQUIRED BY NESHAP REGULATIONS, MARYLAND REQUIRES THAT THE FOLLOWING INFORMATION BE PROVIDED AT THE TIME OF NOTIFICATION: EMPLOYEE INFORMATION. ON A SEPARATE PAGE, PROVIDE THE FOLLOWING INFORMATION FOR EACH EMPLOYEE NOT LISTED ON SCHEDULE I OF "APPLICATION FOR LICENSE TO REMOVE/ENCAPSULATE ASBESTOS" WHO WILL HANDLE ASBESTOS ON THIS PROJECT: 1) **FULL NAME**; 2) **SOCIAL SECURITY NUMBER**; 3) **NAME OF ORGANIZATION THAT PROVIDED APPROVED TRAINING COURSE**; AND 4) **DATE OF MOST RECENT APPROVED TRAINING COURSE ATTENDED**.



CERTIFICATE OF ANALYSIS

Client:	Chamber Environmental	Job Name:	Ardmore Elementary School	Chain Of Custody:	213178
Address:	4928 78th Avenue	Job Location:	Hallway of Storage 1, Main Off. & Teacher Workshop	Date Analyzed:	7/11/2011
	Hyattsville, Maryland 20784	Job Number:	Not Provided	Person Submitting:	Emmanuel Ebong
Attention:	Joseph Dinga	P.O. Number:	Not Provided		

Page 1 of 1

Summary of Transmission Electron Microscopy

Filter Type: MCE

Pore Size: 0.45 um

Filter Size: 25 mm (385 mm²)

AMA Sample Number	Client Sample Number	Volume (L)	Area Analyzed (mm ²)	Analytical Sensitivity s/cc	Asbestos Type Amount	# Non Asbestos Structures	Concentration s/mm ²	s/cc	Sample Type	Comments
1177513	A 1	0	0.0000	****	****	****	****	****	BLK	
1177514	A 2	0	0.0000	****	****	****	****	****	BLK	
1177515	A 3	1200	0.0670	0.0048	0	0	< 15	< 0.0048	IWA	
1177516	A 4	1200	0.0670	0.0048	0	0	< 15	< 0.0048	IWA	
1177517	A 5	1200	0.0670	0.0048	0	0	< 15	< 0.0048	IWA	
1177518	A 6	1200	0.0670	0.0048	0	0	< 15	< 0.0048	IWA	
1177519	A 7	1200	0.0670	0.0048	0	0	< 15	< 0.0048	IWA	

Analytical procedures used meet or exceed the AHERA "Interim Transmission Electron Microscopy Analytical Methods" protocol described in Appendix A to Subpart E of 40 CFR Part 763.

All results are to be considered preliminary and subject to change unless signed by the Technical Director or Deputy.

Technical Director

Andreas Saldivar

Analyst(s)

Michael Creaghan

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public, and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from us. Sample types, locations, and collection protocols are based upon the information provided by the persons submitting them and, unless collected by personnel of these Laboratories, we expressly disclaim any knowledge and liability for the accuracy and completeness of this information. Residual sample material will be discarded in accordance with the appropriate regulatory guidelines, unless otherwise requested by the client. NVLAP accreditation applies only to polarized light microscopy of bulk samples and transmission electron microscopy of AHERA air samples. This report must not be used to claim, and does not imply product certification, approval, or endorsement by NY ELAP, NVLAP, NIST, or any agency of the Federal Government. All rights reserved. AMA Analytical Services, Inc.

An AIHA (#100470), NVLAP (101143-0), and NY ELAP (#10920) Accredited Laboratory

4475 Forbes Blvd. · Lanham, MD, 20706 · (301) 459-2640 · Toll Free (800) 346-0961 · Fax (301) 459-2643



AMA Analytical Services, Inc.

Focused on Results www.amalab.com

AIHA (#100470) NVLAP (#101143-0) NY ELAP (10920)

4475 Forbes Blvd. • Lanham, MD 20706

(301) 459-2640 • (800) 346-0961 • Fax (301) 459-2643

CHAIN OF CUSTODY

(Please Refer To This
Number For Inquiries)

213178

Mailing/Billing Information:

1. Client Name: Chamber Environmental
2. Address 1: _____
3. Address 2: _____
4. Address 3: _____
5. Phone #: _____ Fax #: _____

Submittal Information:

1. Job Name: ARDMORE ELEMENTARY SCHOOL
2. Job Location: Hallway of Storage 1, Main office & Teacher Workshop
3. Job #: _____ P.O. #: _____
4. Contact Person: Joseph Dmaga @ phone # 240 464 1202
5. Submitted by: Immaculate Signature: _____

Reporting Info (Results provided as soon as technically feasible). If no TAT/Reporting Info is provided, AMA will assign defaults of 5-Day and email/fax to contacts on file.

AFTER HOURS (must be pre-scheduled) <input type="checkbox"/> Immediate Date Due: _____ <input type="checkbox"/> 24 Hours Time Due: _____ Comments: _____		NORMAL BUSINESS HOURS <input checked="" type="checkbox"/> Immediate <input type="checkbox"/> Next Day <input type="checkbox"/> 2 Day <input type="checkbox"/> 3 Day <input type="checkbox"/> 5 Day + Date Due: <u>7/11/11</u> <input checked="" type="checkbox"/> Results Required By Noon		REPORT TO: <input type="checkbox"/> Include GOC/Field Data Sheets with Report <input checked="" type="checkbox"/> Email: <u>Chamber Env/iron@yahoo.com</u> <input type="checkbox"/> Fax: _____ <input type="checkbox"/> Verbal: <u>240 464-1202</u>
--	--	--	--	--

Asbestos Analysis

*PCM Air - Please Indicate Filter Type:

- ☐ NIOSH 7400 (QTY)
☐ Fiberglass (QTY)

TEM Air* - Please Indicate Filter Type:

- ☒ AHERA 7 (QTY)
☐ NIOSH 7402 (QTY)
☐ Other (specify _____) (QTY)

PLM Bulk

- ☐ EPA 600 - Visual Estimate (QTY)
☐ EPA Point Count (QTY)
☐ NY State Friable 198.1 (QTY)
☐ Grav. Reduction ELAP 198.6 (QTY)
☐ Other (specify _____) (QTY)

MISC

- ☐ Vermiculite
☐ Asbestos Soil PLM (Qual) PLM (Quan) PLM/TEM (Qual) PLM/TEM (Quan)
 *It is recommended that blank samples be submitted with all air and surface samples

TEM Bulk

- ☐ ELAP 198.4/Chatfield (QTY)
☐ NY State PLM/TEM (QTY)
☐ Residual Ash (QTY)

TEM Dust*

- ☐ Qual. (pres/abs) Vacuum/Dust (QTY)
☐ Quan. (s/area) Vacuum D5755-95 (QTY)
☐ Quan. (s/area) Dust D6480-99 (QTY)

TEM Water

- ☐ Qual. (pres/abs) (QTY)
☐ ELAP 198.2/EPA 100.2 (QTY)
☐ EPA 100.1 (QTY)

☒ All samples received in good condition unless otherwise noted.
(TEM Water samples _____ °C)

Metals Analysis

- ☐ Pb Paint Chip (QTY)
☐ *Pb Dust Wipe (wipe type _____) (QTY)
☐ *Pb Air (QTY)
☐ Pb Soil/Solid (QTY)
☐ Pb TCLP (QTY)
☐ Drinking Water ☐ Pb (QTY) ☐ Cu (QTY) ☐ As (QTY)
☐ Waste Water ☐ Pb (QTY) ☐ Cu (QTY) ☐ As (QTY)
☐ Pb Furnace (Media _____) (QTY)

Fungal Analysis

- Collection Apparatus for Spore Traps/Air Samples: _____
 Collection Media _____
☐ *Spore-Trap (QTY) ☐ Surface Vacuum Dust (QTY)
☐ *Surface Swab (QTY) ☐ Culturable ID Genus (Media _____) (QTY)
☐ *Surface Tape (QTY) ☐ Culturable ID Species (Media _____) (QTY)
☐ Other (Specify _____) (QTY)

*It is recommended that blank samples be submitted with all air and surface samples																											
CLIENT ID #		SAMPLE INFORMATION		ANALYSIS												MATRIX										CLIENT CONTACT	
SAMPLE LOCATION/ID		DATE/TIME	VOL (L)/ Wipe Area	TEM	PCM	PLM	LEAD	MOLD	AIR	BULK	DUST	WATER AND OTHER	SPORE TRAP	TAPE	SWAB	(LABORATORY STAFF ONLY)											
A1	Field Blank	7/8/11	1200														Date/Time:	Contact:	By:								
A2	Field Blank																										
A3	1WA																										
A4	1WA																										
A5	1WA																Date/Time:	Contact:	By:								
A6	1WA																										
A7	1WA																										
																	Date/Time:	Contact:	By:								

LABORATORY
STAFF ONLY:
(CUSTODY)

1. Date/Time RCVD: 7/8/11 @ ISSS Via: D/O By (Print): NICOLE MARWEN Sign: [Signature]
 2. Date/Time Analyzed: 7/11/11 @ 1000 By (Print): Paul Cough Sign: [Signature]
 3. Results Reported To: _____ Via: _____ Date: _____ / _____ / _____ Time: _____ Initials: _____
 4. Comments: _____

SERVICE TRANSPORT GROUP, INC.

58 PYLES LANE, NEW CASTLE, DE 19720

PHONE: (877) 999-9559

Nº 324778

WASTE SHIPMENT RECORD

S.T.G. # 38942

GENERATOR	1. Material Origin Site Ardmore Elementary School 9301 Ardmore - Ardmore Road Springdale, MD 20774		Generator: Name/Address Prince Georges County Public Schools 1500 Old Marlboro Pike Springfield, MD 20772		Generator: Phone # 301-952 6500
	2. Removal Contractor: Name/Address Asbestos Specialists, Inc. P. O. Box 368 Linthicum Heights, MD 21090 Contact: Sam Chairs, III				Contractor: Phone # 410-796-5359
	3. Responsible Agency: Name/Address U.S. EPA Region III 1650 Arch Street Philadelphia, PA 19103-2029		4. US DOT Class - FRIABLE ASBESTOS ONLY NA 2212, RQ ASBESTOS, 9, PG III		
	5. Description of Materials Specify Friable or Non-Friable		Containers No.	Type	Total Quantity
	IF Friable (enter required information)		29 Bags		
	IF Non-Friable (check one): <input type="checkbox"/> Category I <input type="checkbox"/> Category II		17 Drums		
	6. Special Handling Instructions 24-hour emergency spill response no. 800-424-9300				
7. Generator Certification: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport by highway according to the applicable regulations of the Department of Transportation, US E.P.A., and any other state government agency. I certify that the foregoing is true and correct to the best of my knowledge. If the waste shipment is not as I stated, I accept the RETURN of the COMPLETE LOAD to the generator's service location at the generator's expense.					
Printed/Typed Name & Title Shawn Morosko, Supervisor		Signature <i>[Signature]</i>		Date 7/8/11	
TRANSPORTER	8. Transporter 1 (Acknowledgement of Receipt of Materials) If blank, see Transporter 2 or 3 below.				
	Company Name & Address SAME AS #10		Signature: <i>[Signature]</i>		Telephone No. 301-111-1111
			Printed Name: <i>[Signature]</i>		Date: 7/10/11
			Title: <i>[Signature]</i>		
	9. Transporter 2 (Acknowledgement of Receipt of Materials)				
Company Name & Address SAME AS #10		Signature: <i>[Signature]</i>		Telephone No.	
		Printed Name: <i>ROBERT MURPHY</i>		Date: 7/29/11	
		Title: <i>DRIVER</i>			
DISPOSAL SITE	10. Transporter 3 (Acknowledgement of Receipt of Materials)				
	Company Name & Address Service Transport Group, Inc. 58 Pyles Lane New Castle, DE 19720		Signature: _____		Telephone No. 877-999-9559
			Printed Name: _____		Date: _____
			Title: _____		
	11. Discrepancy Indication Space: _____				
12. Waste Disposal Site Owner or Operator's Certification (Receipt of above Waste except as noted in 11)					
Waste Disposal Site (Check One)		STG USE ONLY		Date: _____	
Sanitary Landfill <input type="checkbox"/> 901 Tyrol Blvd. Belle Vernon, PA 15012 724-929-7694 Ext. 14 Permit No. 100277		Minerva Landfill <input checked="" type="checkbox"/> 8955 Minerva Rd. Waynesburg, OH 44688 330-863-3155 Permit No. P0104984		Signature: _____ Printed Name: _____ Title: _____	

2500 BROENING HIGHWAY BALTIMORE MD 21224

OFFICE USE ONLY → Notification ID:

Notification Type: (Check one) →

☒ [O] ORIGINAL [First Notice THIS Project]

Resp Agency: S

Original Submit Date: 12-5-14

☐ [R] Revision Revision #

Variance Request Attached? (Y/N)

[If THIS is a revision]

Revision Date: _____

☐ [P] Postpone → ☐ [R] Reschedule

Received Date: →

[Date of THIS Revision]

☐ [C] Cancel → ☐ [R] Reschedule

Postmark Date: →

If this is a Revision, what are you revising?

☐ Start Date☒ Complete Date

Initials/Date:

☐ Other (Specify)☒ Quantity

Type of Project NESHAP →

☒ [N] Renovation☐ [D-N] Demolition☐ [D-N] DEMO ONLY (no asbestos)[Operation]: Non-NESHAP → ☐ [S-N] Renovation ☐ [D-N] Demolition ☐ [S-N] Encapsulation

I. JOB/SITE DATA

Emergency? ☐ Yes ☒ NoAsbestos Present? ☒ Yes ☐ No

Enter PROJECT [Site/Building] NAME below: ↓

PGCP-Ardmore Elem School

Street Address: 9301 Andwick-Ardmore Rd.

Region: 03

County ID: 16 [From below]

City: Springdale

State: MD

Zip: 20774

01 Allegany	04 Calvert	07 Cecil	10 Frederick	13 Howard	16 Prince George	19 Somerset	22 Wicomico
02 Anne Arundel	05 Caroline	08 Charles	11 Garrett	14 Kent	17 Queen Anne	20 Talbot	23 Worcester
03 Baltimore	06 Carroll	09 Dorchester	12 Harford	15 Montgomery	18 St Mary	21 Washington	24 Baltimore City

Project/Site Location Description: (BE SPECIFIC!...Bldg, Room, Floor # etc.) Rx VAT mastic in hallway&2 CR

Building Size: 78000

(SQ FT)

No. Floors: 2

Present/Prior Use: B-Ship, C-Commercial, G-Government, H-Hospital, I-Industrial, O-Office, P-Public Building, R-Residence, S-School, U-University/College, V-Vacant, T-Other

Present Use: S

(LN FT)

Age: 59

Prior Use: S

II. ASBESTOS/PROJECT DATA

Nonfriable Not Removed

Nonfriable Removed

Amount of Asbestos	RACM Removed	CAT I	CAT II	CAT I	CAT II	Unit
Pipes						LnFt
Surface Area	2900					SqFt
Vol Off Fac Component						CuFt

Removal/Encapsulation/Demolition → Start Date: 12-22-14

Completion Date: 12-29-14

of Workers: 6

Project Supervisor: Raymond Scheerer

Days Worked: (4) Mon-Mon

Hours Worked: 7am-3p

III. RESPONSIBLE PARTIES

Describe asbestos (e.g. pipe insulation, boiler breeching, floor tile, etc.)
VAT,Mastic

A. Asbestos Contractor: A & I Inc.

MD License #: M21-03-055

Project Contact: Douglas M Smith

Telephone: 410-238-3020

B. Other [including Demolition] Contractor:

Address:

Contact:

City, State, Zipcode:

Telephone:

C. Owner: Prince Georges County Public Schools

Address: 13300 Old Marlboro Pike

Contact: William Dallas

City, State, Zipcode: Upper Marlboro MD. 20772

Telephone: 301-952-6559

III. RESPONSIBLE PARTIES *(continued)*

D. **Waste Transporter:** Service Transport Group Inc

Address: 58 Pyles Lane

Contact: Barry

City, State, Zipcode New Castle DE 19720

Telephone: 877-999-9559

E. **Landfill:** Minerva Landfill

Address: 9000 Minerva Road

Contact: Steve Chandler

City, State, Zipcode Waynesburg OH 44688

Telephone: 330-866-3435

IV. WORK PRACTICES

- A. Procedure, including analytical method, if appropriate, used to detect the presence of asbestos. *(Use additional sheets, if necessary)*
EPA 600 / M4-82-020

- B. Description of planned demolition, renovation, or encapsulation work and method(s) to be used: *(Use additional sheets, if necessary)*
remove asbestos material, wet methods used , 3 Stage Decon, Neg Air ,floor tile and mastic,ceiling tile use full set-up,
Employee to wear suits & respairtors- use buffer methods to remove mastic.

- C. Description of work practices and engineering controls to be used to prevent emissions of asbestos at the demolition, renovation and/or encapsulation site: *(Use additional sheets, if necessary)*
6mil. poly critical barriers to isolate area , hepa air , surfactant to wet ACM , seal ACM in 6mil. Labeled bags

- D. EMERGENCY RENOVATIONS: Date and Hours of Emergency: (MM/DD/YY) Time:
Description of the sudden, unexpected event: *(Use additional sheets, if necessary)*
N/A

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden: *(Use additional sheets, if necessary)*
N/A

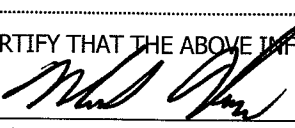
- E. Description of procedures to be followed in the event that unexpected asbestos is found or previously nonfriable asbestos material becomes crumbled, pulverized, or reduced to powder. *(Use additional sheets, if necessary)*
IF MATERIAL BECOMES FRIABLE JOB WILL STOP & RENOTIFY

- F. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING THE DEMOLITION, RENOVATION OR ENCAPSULATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS.


Signature

12-5-14
Date

- G. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.


Signature

12-5-14
Date

- H. IN ADDITION TO THE INFORMATION REQUIRED BY NESHAP REGULATIONS, MARYLAND REQUIRES THAT THE FOLLOWING INFORMATION BE PROVIDED AT THE TIME OF NOTIFICATION: EMPLOYEE INFORMATION. ON A SEPARATE PAGE, PROVIDE THE FOLLOWING INFORMATION FOR EACH EMPLOYEE NOT LISTED ON SCHEDULE I OF "APPLICATION FOR LICENSE TO REMOVE/ENCAPSULATE ASBESTOS" WHO WILL HANDLE ASBESTOS ON THIS PROJECT: 1) **FULL NAME**; 2) **SOCIAL SECURITY NUMBER**; 3) **NAME OF ORGANIZATION THAT PROVIDED APPROVED TRAINING COURSE**; AND 4) **DATE OF MOST RECENT APPROVED TRAINING COURSE ATTENDED**.

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191413439

CustomerID: TIDE50

CustomerPO:

ProjectID:

Attn: **Meneka Rodrigo**
Tidewater, Inc.
6625 Selnick Drive
Suite A
Elkridge, MD 21075

Phone: (410) 997-4458
Fax: (410) 997-8713
Received: 12/23/14 4:40 PM
Analysis Date: 12/23/2014
Collected: 12/23/2014

Project: **ARDMORE ELEMENTARY**

Test Report: Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM)
Performed by EPA 40 CFR Part 763 Appendix A to Subpart E

Sample	Location	Volume (Liters)	Area Analyzed (mm ²)	Non Asb	Asbestos Type(s)	# Structures			Analytical Sensitivity (S/cc)	Asbestos Concentration	
						≥ 0.5μ	< 5μ	≥ 5μ		(S/mm ²)	(S/cc)
MG122314-01	ARDMORE ELEMENTARY RM K1 IWA	1200.00	0.0650	0	None Detected				0.0049	<15.00	<0.0049
191413439-0001											
MG122314-02	ARDMORE ELEMENTARY RM K1 IWA	1200.00	0.0650	0	None Detected				0.0049	<15.00	<0.0049
191413439-0002											
MG122314-03	ARDMORE ELEMENTARY RM K1 IWA	1200.00	0.0650	0	None Detected				0.0049	<15.00	<0.0049
191413439-0003											
MG122314-04	ARDMORE ELEMENTARY RM K1 IWA	1200.00	0.0650	0	None Detected				0.0049	<15.00	<0.0049
191413439-0004											
MG122314-05	ARDMORE ELEMENTARY RM K1 IWA	1200.00	0.0650	0	None Detected				0.0049	<15.00	<0.0049
191413439-0005											

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Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/23/2014 21:10:52

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191413439

CustomerID: TIDE50

CustomerPO:

ProjectID:

Attn: **Meneka Rodrigo**
Tidewater, Inc.
6625 Selnick Drive
Suite A
Elkridge, MD 21075

Phone: (410) 997-4458
Fax: (410) 997-8713
Received: 12/23/14 4:40 PM
Analysis Date: 12/23/2014
Collected: 12/23/2014

Project: **ARDMORE ELEMENTARY**

The samples in this report were submitted to EMSL for analysis by Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM) Performed by EPA 40 CFR Part 763 Appendix A to Subpart E. The reference number for these samples is the EMSL Order ID above. Please use this reference number when calling about these samples.

Report Comments:

Sample Receipt Date::	12/23/2014	Sample Receipt Time:	4:40 PM
Analysis Completed Date:	12/23/2014	Analysis Completed Time:	8:40 PM

Analyst(s):

Sunil Shrestha TEM AHERA (5)

Samples reviewed and approved by:Joe Centifonti, Laboratory Manager
or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/23/2014 21:10:52

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191413474

CustomerID: TIDE50

CustomerPO:

ProjectID:

Attn: **Meneka Rodrigo**
Tidewater, Inc.
6625 Selnick Drive
Suite A
Elkridge, MD 21075

Phone: (410) 997-4458
Fax: (410) 997-8713
Received: 12/26/14 11:20 AM
Analysis Date: 12/26/2014
Collected: 12/26/2014

Project: **ARDMORE ES**

Test Report: Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM)
Performed by EPA 40 CFR Part 763 Appendix A to Subpart E

Sample	Location	Volume (Liters)	Area Analyzed (mm ²)	Non Asb	Asbestos Type(s)	# Structures		Analytical Sensitivity (S/cc)	Asbestos Concentration	
						≥ 0.5μ	< 5 ≥ 5μ		(S/mm ²)	(S/cc)
IWA-1	ROOM 34 INSIDE WORK AREA	1200.00	0.0650	0	None Detected			0.0049	<15.00	<0.0049
191413474-0001										
IWA-2	ROOM 34 INSIDE WORK AREA	1200.00	0.0650	0	None Detected			0.0049	<15.00	<0.0049
191413474-0002										
IWA-3	ROOM 34 INSIDE WORK AREA	1200.00	0.0650	0	None Detected			0.0049	<15.00	<0.0049
191413474-0003										
IWA-4	ROOM 34 INSIDE WORK AREA	1200.00	0.0650	0	None Detected			0.0049	<15.00	<0.0049
191413474-0004										
IWA-5	ROOM 34 INSIDE WORK AREA	1200.00	0.0650	0	None Detected			0.0049	<15.00	<0.0049
191413474-0005										

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Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/26/2014 16:26:01

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191413474

CustomerID: TIDE50

CustomerPO:

ProjectID:

Attn: **Meneka Rodrigo**
Tidewater, Inc.
6625 Selnick Drive
Suite A
Elkridge, MD 21075

Phone: (410) 997-4458
Fax: (410) 997-8713
Received: 12/26/14 11:20 AM
Analysis Date: 12/26/2014
Collected: 12/26/2014

Project: **ARDMORE ES**

The samples in this report were submitted to EMSL for analysis by Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM) Performed by EPA 40 CFR Part 763 Appendix A to Subpart E. The reference number for these samples is the EMSL Order ID above. Please use this reference number when calling about these samples.

Report Comments:

Sample Receipt Date::	12/26/2014	Sample Receipt Time:	11:20 AM
Analysis Completed Date:	12/26/2014	Analysis Completed Time:	4:14 PM

Analyst(s):

Joe Centifonti TEM AHERA (5)

Samples reviewed and approved by:

Joe Centifonti, Laboratory Manager
or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/26/2014 16:26:01

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191413489

CustomerID: TIDE50

CustomerPO:

ProjectID:

Attn: **Meneka Rodrigo**
Tidewater, Inc.
6625 Selnick Drive
Suite A
Elkridge, MD 21075

Phone: (410) 997-4458
Fax: (410) 997-8713
Received: 12/26/14 5:26 PM
Analysis Date: 12/26/2014
Collected:

Project: **Ardmore Elementary School- Main Hallway**

Test Report: Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM)
Performed by EPA 40 CFR Part 763 Appendix A to Subpart E

Sample	Location	Volume (Liters)	Area Analyzed (mm ²)	Non Asb	Asbestos Type(s)	# Structures		Analytical Sensitivity (S/cc)	Asbestos Concentration	
						≥ 0.5μ	< 5μ		(S/mm ²)	(S/cc)
MG122614-01 191413489-0001	IWA Main Hallway	1250.00	0.0650	0	None Detected			0.0047	<15.00	<0.0047
MG122614-02 191413489-0002	IWA Main Hallway	1250.00	0.0650	0	None Detected			0.0047	<15.00	<0.0047
MG122614-03 191413489-0003	IWA Main Hallway	1250.00	0.0650	0	None Detected			0.0047	<15.00	<0.0047
MG122614-04 191413489-0004	IWA Main Hallway	1250.00	0.0650	0	None Detected			0.0047	<15.00	<0.0047
MG122614-05 191413489-0005	IWA Main Hallway	1250.00	0.0650	0	None Detected			0.0047	<15.00	<0.0047

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Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/26/2014 20:36:29

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191413489

CustomerID: TIDE50

CustomerPO:

ProjectID:

Attn: **Meneka Rodrigo**
Tidewater, Inc.
6625 Selnick Drive
Suite A
Elkridge, MD 21075

Phone: (410) 997-4458
Fax: (410) 997-8713
Received: 12/26/14 5:26 PM
Analysis Date: 12/26/2014
Collected:

Project: **Ardmore Elementary School- Main Hallway**

The samples in this report were submitted to EMSL for analysis by Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM) Performed by EPA 40 CFR Part 763 Appendix A to Subpart E. The reference number for these samples is the EMSL Order ID above. Please use this reference number when calling about these samples.

Report Comments:

Sample Receipt Date::	12/26/2014	Sample Receipt Time:	5:26 PM
Analysis Completed Date:	12/26/2014	Analysis Completed Time:	8:30 PM

Analyst(s):

Sunil Shrestha TEM AHERA (5)

Samples reviewed and approved by:Joe Centifonti, Laboratory Manager
or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/26/2014 20:36:29

SERVICE TRANSPORT GROUP, INC.

58 PYLES LANE, NEW CASTLE, DE 19720

PHONE: (877) 999-9559

Nº 444462

WASTE SHIPMENT RECORD

S.T.G. # 56588

GENERATOR	1. Material Origin Site Prince George's County Public Schools Ardmore Elementary 9301 Ardmore Road Landover, Maryland 20772		Generator: Name/Address Prince George's County Public Schools 1330 Upper Marlboro Pike Upper Marlboro, Maryland 20772		Generator: Phone # 240-832-6459
	2. Removal Contractor: Name/Address A & I, Inc. 8301B Pulaski Highway Baltimore, MD 21237 Contact: Kimberly Kursch				Contractor: Phone # 410-238-3020
	3. Responsible Agency: Name/Address U.S. EPA Region III 1650 Arch Street Philadelphia, PA 19103-2029		4. US DOT Class - FRIABLE ASBESTOS ONLY NA2212, Asbestos, 9, PG III, RQ		
	5. Description of Materials Specify Friable or Non-Friable 18890		Containers No. 112	Type Bag	Total Quantity 112
	IF Friable (enter required information)				
	IF Non-Friable (check one): <input type="checkbox"/> Category I <input type="checkbox"/> Category II				
	6. Special Handling Instructions				
7. Generator Certification: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport by highway according to the applicable regulations of the Department of Transportation, US E.P.A., and any other state government agency. I certify that the foregoing is true and correct to the best of my knowledge. If the waste shipment is not as I stated, I accept the RETURN of the COMPLETE LOAD to the generator's service location at the generator's expense.					
Printed/Typed Name & Title Kimberly Kursch, Manager		Signature 		Date 1/7/15	
TRANSPORTER	8. Transporter 1 (Acknowledgement of Receipt of Materials) If blank, see Transporter 2 or 3 below.				
	Company Name & Address		Signature: _____		Telephone No.
			Printed Name: _____		Date:
			Title: _____		
	9. Transporter 2 (Acknowledgement of Receipt of Materials)				
Company Name & Address		Signature: _____		Telephone No.	
		Printed Name: _____		Date:	
		Title: _____			
DISPOSAL SITE	10. Transporter 3 (Acknowledgement of Receipt of Materials)				
	Company Name & Address Service Transport Group, Inc. 58 Pyles Lane New Castle, DE 19720		Signature:		Telephone No. 877-999-9559
			Printed Name:		Date: 1/13/15
			Title:		
	11. Discrepancy Indication Space:				
12. Waste Disposal Site Owner or Operator's Certification (Receipt of above Waste except as noted in 11)					
Waste Disposal Site (Check One)		STG USE ONLY		Date:	
Sanitary Landfill <input type="checkbox"/> 901 Tyrol Blvd. Belle Vernon, PA 15012 724-929-7694 Ext. 14 Permit No. 100277	Minerva Landfill <input checked="" type="checkbox"/> 8955 Minerva Rd. Waynesburg, OH 44688 330-866-3435 Permit No. P0104984			Signature: _____	
				Printed Name: _____	
				Title: _____	

From: [Convery, Christine](#)
To: [William Dallas](#)
Cc: [Ponak, Rich](#); [Carl Belcher](#); [Alex Baylor](#); [Kathryn Munson](#)
Subject: RE: Ardmore Elementary School
Date: Monday, April 13, 2015 4:43:00 PM

Mr. Dallas,

I'd like to speak with Mr. Baylor, as the qualified inspector, regarding the 3-year reinspections at Ardmore. Primarily, I'd like to discuss with him the process for performing the inspection as well as what records he keeps documenting the inspection and the findings/recommendations. It wasn't clear from our previous conversation what records, if any, you have in addition to the "proof" of your reinspection. Typically, a school will have a report of some sort that results from a 3-year reinspection.

As I believe you are aware, in accordance with the regulations, an accredited inspector must visually reinspect and reassess the condition of all known or assumed friable asbestos containing building materials (ACBM), visually inspect previously considered nonfriable ACBM and touch it to determine if it has become friable, identify homogeneous areas of material that have become friable since the last inspection developed required records and submit the records to you (the AHERA Designated Person) within 30 days of reinspection. Further, the records of the inspection must include:

- The date of the reinspection, the name and signature of the person making the reinspection, and accreditation documentation;
- Any changes in the condition of known or assumed asbestos containing building materials;
- Exact location where samples were collected during the reinspection, a description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, and accreditation documentation;
- Any assessments or reassessments made of friable material, the name and signature of the accredited inspector and accreditation documentation; and
- Written recommendations of the management planner.

In the event a 3 year reinspection coincides with a planned 6-month surveillance, you can substitute the 3-year reinspection for a 6-month surveillance, but not the other way around (i.e., 6-month surveillance cannot take the place of a 3-year reinspection, since reinspections are more comprehensive than a 6-month surveillance).

Finally, I'd like to discuss the floor tile removals that occurred in late 2014. I'd like to find out the reason the floor tile was removed and what method was used.

Please let me know when we can talk. I could do early Tuesday afternoon, if that works for you.

Thanks,
Christine

Christine Convery
Compliance and Enforcement Officer
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: 215-814-2249

From: William Dallas [mailto:william.dallas@pgcps.org]
Sent: Monday, February 02, 2015 2:54 PM
To: Convery, Christine
Cc: Ponak, Rich; Carl Belcher; Alex Baylor; Kathryn Munson
Subject: Re: Ardmore Elementary School

Good Afternoon Ms. Convery,

Please find attached the following concerning Ardmore ES:

- Proof of 2011 and 2014 three year re-inspections;
- Proof of the last four periodic surveillances;
- Records of the last three years of response actions (EPA notifications, final clearance results and waste manifests)

If you have any further questions, feel free to contact me.

Sincerely,

--

William E. Dallas, CSP / Environmental Specialist

Prince George's County Public Schools / Division of Supporting Services / Building Services
13306 Old Marlboro Pike, Upper Marlboro, MD 20772
Office Number: 301-952-0831 / Mobile Number 240-832-6459 / Fax Number: 301-952-0346

Email Address: william.dallas@pgcps.org / Website: <http://www1.pgcps.org/environment/>

Note:

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Thank you.

On Tue, Jan 27, 2015 at 9:31 AM, William Dallas <william.dallas@pgcps.org> wrote:

Good Morning Ms. Convery,

We will get those records to your office as soon as possible.

Dallas

On Mon, Jan 26, 2015 at 1:20 PM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Mr. Dallas,

Thanks for speaking with me this morning. Regarding the Ardmore Elementary School, please provide the following in hard copy or PDF/email:

- 1) Two (2) most recent 3-year re-inspections
- 2) Four (4) most recent period surveillance
- 3) Records of response actions for the last 3 years

I left a voicemail for Mike Sweeney with MDE this morning, so I'll be in touch with him soon.

Thank you,

Christine Convery
Compliance and Enforcement Officer
Pesticides and Asbestos Programs Branch (3LC62) | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: [215-814-2249](tel:215-814-2249)

--

William E. Dallas, CSP / Environmental Specialist

Prince George's County Public Schools / Division of Supporting Services / Building Services
13306 Old Marlboro Pike, Upper Marlboro, MD 20772
Office Number: [301-952-0831](tel:301-952-0831) / Mobile Number [240-832-6459](tel:240-832-6459) / Fax Number: [301-952-0346](tel:301-952-0346)

Email Address: william.dallas@pgcps.org / Website: <http://www1.pgcps.org/environment/>

Note:

If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer.

Thank you.

--

William E. Dallas, CSP / Environmental Specialist

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Thank you.

4/16/15

Alex Baylor

- 3 yr - go through building
update drawings & quantities,
if necessary
- take care of issues as they arise
 - ongoing process
 - update the book

Water leak → this was the reason
for the
→ chose to do whole
class

Carpet
smelled
floor
decided to
remove
preschool

Leak occurred in both class

no carpet K1 - Carpet
34 - damaged floor tile
1 WFA Main Hallway (section removed)
↳ also dam removed damaged

all tile removed

↓ \$ came & took opportunity

leak - teacher complained b/c of odor
of toxic bldg system
called @ smell.

- Nothing to do w/ asbestos.

eval. what was damaged. -

Right after changed quantities
in the book. (mgt plan)

work order system →

emerge
for friable Go ahead & abate right then

Same way - for routine removal.
↳ floor tile/non friable

If something cracking, they will get it
address asap.

From: [Wisniewski, Patti-Kay](#)
To: [Convery, Christine](#)
Subject: FW: FOIA EPA R3 2016 010419
Date: Wednesday, September 09, 2015 11:18:06 AM

I thought that this background might be of interest to you for responding to recent FOIA request about asbestos in the school. The requestor did not ask about lead in drinking water, only asbestos, which is not required to be monitored under the Safe Drinking Water Act.

Patti Kay

From: Meadows, Anthony
Sent: Wednesday, September 09, 2015 10:40 AM
To: Watson, Josephine; Wisniewski, Patti-Kay
Subject: RE: FOIA EPA R3 2016 010419

FW: (CAA - FY15-124886-3714-CV) Referred to Region - Maryland

I had a vague recollection of an inquiry. We have no specific information on-site.

Anthony D. Meadows
Drinking Water Branch
EPA Region III (3WP21)
(215) 814-5442

From: Meadows, Anthony
Sent: Wednesday, January 21, 2015 10:42 AM
To: William Arguto (arguto.william@epa.gov)
Subject: FW: (CAA - FY15-124886-3714-CV) Referred to Region - Maryland

The following is what I learned from Maryland.

Anthony D. Meadows
Drinking Water Branch
EPA Region III (3WP21)
(215) 814-5442

From: Saeid Kasraei -MDE- (<mailto:saeid.kasraei@maryland.gov>)
Sent: Wednesday, January 21, 2015 9:40 AM
To: Meadows, Anthony
Subject: Re: (CAA - FY15-124886-3714-CV) Referred to Region - Maryland

Anthony,

We contacted Prince George's County Public Schools who are aware of the issue and their staff have been actively involved in meeting with the Ardmore Elementary School. Their most recent meeting was January 12, 2015.

The school is served by WSSC, but water quality samples taken from the school indoor plumbing has shown elevated lead levels. Another issue is the presence of asbestos in the building. The school's drinking water tested high for lead in 2004, 2009, and most recently in November 2014. The school has been on bottled water since 2004, and water fountains that had elevated lead levels have been taken out of service. The school provides meals for the students. The kitchen taps have routinely tested below the Lead Action Level of 15 parts per billion, as well as other sample sites throughout the school. In November 2014, some areas of the school continued to have elevated lead levels.

Prince George's County has limited funding to complete maintenance on their schools. Capital funding to replace the school or building plumbings is not currently available. However, bottled water will continue to be provided throughout the school. The school has secured funding for removal of broken asbestos floor tiles that are located throughout the school. The parents have been very vocal, and these issues have been reported previously. The parents do not believe the assertions by the County that the school is safe. Below is a link to an article from a local paper. The SDWA does not provide any authority for the primacy program to regulate water quality inside a customer home/building that is on a public system. The school system is aware that the lead in the drinking water is related to the plumbing in the building, and it is not related to the Washington Suburban Sanitary Commission water system. Thanks.

Recent information:

<http://ardmoreelementaryschool.blogspot.com/>

<http://www.gazette.net/article/20141204/NEWS/141209630/1077/parents-call-for-overhaul-of-springdale-school&template=gazette>

On Tue, Jan 20, 2015 at 3:44 PM, Meadows, Anthony <Meadows.Anthony@epa.gov> wrote:

Saeid,

Hello, attached below is a complaint involving a school in Maryland. Are you aware of it? Has anyone on your staff looked into it? If so, actually either way, please let me know what you know.?

Thanks.
Anthony Meadows

Sent from my iPhone

Begin forwarded message:

From: "Arguto, William" <Arguto.William@epa.gov>
Date: January 20, 2015 at 12:44:19 PM EST
To: "Meadows, Anthony" <Meadows.Anthony@epa.gov>
Cc: "Donahue, Lisa" <Donahue.Lisa@epa.gov>
Subject: FW: (CAA - FY15-124886-3714-CV) Referred to Region - Maryland

Anthony – This was forwarded to me last week and I am not sure if there was a follow up. Could you check in with Nancy to see about

the compliant. I Cc'd Lisa because of her experience with school lead issues

Thanks

From: chelius.kyle@epa.gov [<mailto:chelius.kyle@epa.gov>]

Sent: Wednesday, January 14, 2015 1:39 PM

To: Arguto, William

Subject: FWD: (CAA - FY15-124886-3714-CV) Referred to Region - Maryland

01/14/2015

SUBJECT: FWD: (CAA - FY15-124886-3714-CV) Referred to Region - Maryland

FROM: chelius.kyle@epa.gov

TO: arguto.william@epa.gov

CC:

Bill - This was forwarded to us but it's lead in drinking water. We deal with lead-based paint. thanks, Kyle

-----Original Message-----

1/13/2015 7:27 PM

HQ LEAD NUMBER: FY15-124886-3714-CV

SUBJECT: Referred to Region - Maryland

FROM: Sandaliz_o@yahoo.com

TO:

Name: Sandraliz Olive

Address: 2818 Foxglove Way

City: Springdale

State: Maryland

Zip: 20774

Phone: [240-449-7502](tel:240-449-7502)

Alleged Violator's Name: Ardmore Elementary School

Alleged Violator's Address: 9301 Ardwick Ardmore Road

Alleged Violator's City: Springdale

Alleged Violator's State: Maryland

Alleged Violator's Zip: 20774

Tip or Complaint: There are exposed cracked asbestos tiles and high levels of lead in the water at Ardmore Elementary school. According to the red book the tiles should have been replaced back in 1999. The schools environmental officer Mr. Dallas claims these tiles are not a risk. We need help. These are young innocent children. My two children attend this school. We have photos and detailed water report from November 2014. You can contact my husband for all the facts and proof: Keith Olive kolive@gpo.gov 202-207-7059

Violation Still Occurring? Yes

State DEP/DEQ/DEM Notified? No

--

Saeid Kasraei
Administrator
Water Supply Program
Maryland Department of The Environment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Kevin M. Maxwell, Superintendent
Prince George's County School District
14201 School Lane
Upper Marlboro, MD 20772

NOV 17 2015

Re: Ardmore Elementary School
Notice of Noncompliance and Request to Show Cause
Case Number: A-16-001

Dear Dr. Maxwell:

Please be advised that on the basis of information obtained during an on-site school inspection by the Maryland Department of the Environment ("MDE") and a review of pertinent documents, the United States Environmental Protection Agency, Region III ("EPA" or "the Agency") has determined that Prince George's County School District ("PGCSD" or "you") has failed to comply with certain requirements of the Asbestos Hazard and Emergency Response Act ("AHERA"), which comprises subchapter II of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. §§ 2601 *et seq.*, and its implementing regulations promulgated at 40 C.F.R. Part 763, Subpart E. The Agency is sending this to your attention because PGCSD is considered to be the Local Education Agency ("LEA"), as defined in 40 C.F.R. § 763.83, for Ardmore Elementary School. As a result of these findings, the Agency is issuing you this Notice of Noncompliance ("NON") and Request to Show Cause why EPA's information is not correct and why additional enforcement action is not appropriate for these violations. A description of the relevant facts and a list of the specific violations identified by EPA are outlined below.

I. RELEVANT FACTS

On January 30, 2015, an authorized representative of MDE conducted an inspection at Ardmore Elementary School located, 9301 Arwick-Ardmore Road, Springdale, Maryland, 20774. The inspector conducted a review of the management plan and a walk-through inspection, and was accompanied by Alex Baylor, Rodney Curtis, William Dallas and David Carter. On the basis of information collected during this inspection and information collected by EPA following the inspection, it has been determined that PGCSD had failed to:

- a) Perform an inspection;

- b) conduct reinspections of the school buildings every 3 years; and
- c) collect bulk samples from each homogenous area material, that is not assumed to be ACM.

II. TSCA/AHERA VIOLATIONS

EPA has determined that violations of the following TSCA/AHERA regulatory requirements occurred within the Ardmore Elementary School. Based upon the information currently available, EPA also has determined that the issuance of an Administrative Complaint is the appropriate enforcement response to address these violations of the Act.

A. Failure to Perform an Inspection

40 C.F.R. § 763.85(a) requires that:

- (1) Except as provided in paragraph (a)(2) of this section, before October 12, 1988, local education agencies shall inspect each school building that they lease, own, or otherwise use as a school building to identify all locations of friable and nonfriable ACBM
- (2) Any building leased or acquired on or after October 12, 1988, that is to be used as a school building shall be inspected as described under paragraphs (a)(3) and (4) of this section prior to use of a school building.

As a result of the January 30, 2015 inspection, MDE found that PGCSO had not inspected or obtained an exclusion¹ for 1) the 1999 addition to Ardmore Elementary School and 2) the modular building unit at Ardmore Elementary School. Based on currently available information, EPA concludes that PGCSO failed to comply with the requirements of 40 C.F.R. § 763.85(a).

B. Failure to Conduct Reinspections

40 C.F.R. § 763.85(b) requires that:

At least once every 3 years after a management plan is in effect, each local education agency shall conduct a reinspection of all friable and nonfriable known or assumed ACBM in each school building that they lease, own, or otherwise use as a school building.

¹ A LEA shall not be required to perform an inspection under § 763.85(a)...where an architect or project engineer responsible for construction or an accredited inspector signs a statement that no ACBM was specified as a building material in any construction document for the building or to the best of his or her knowledge, no ACBM was used as a building material in the building. The LEA shall submit a copy of the signed statement to the EPA Regional Office and shall include the statement in the management plan for that school.

As a result of the January 30, 2015 inspection and subsequent written and verbal communication with PGCSO, EPA found that PGCSO did not conduct a 3 year reinspection, in accordance with 40 C.F.R. § 763.85(b) and § 763.88, in at least 2014 or 2011. Based on currently available information, EPA concludes that PGCSO failed to comply with the reinspection requirements of 40 C.F.R. § 763.85(b).

C. Failure to Collect Bulk Samples

40 C.F.R. § 763.86 provides, *inter alia*, that:

An accredited inspector collect bulk samples from each homogenous area material, that is not assumed to be ACM, in accordance with the requirements outlined in 40 C.F.R. § 763.86(a) through (d).

As a result of the January 30, 2015 inspection, MDE found that PGCSO had not collected bulk samples in accordance with 40 C.F.R. § 763.86 during the inspection for suspected material not assumed to be ACM for the following suspect materials in Ardmore Elementary School: 3" black, brown, beige and 4" navy blue vinyl based cove moldings-mastics, veneer and cores of folding partition walls 30-2 and 24-26, stainless sink undercoatings, rope and woven gasketing on two Hurst boilers, navy stage curtain in multi-purpose room. Based on currently available information, EPA concludes that PGCSO failed to comply with the requirements of 40 C.F.R. § 763.86.

III. REQUEST FOR INFORMATION AND CERTIFICATION, TO SHOW CAUSE & OPPORTUNITY TO CONFER

To facilitate settlement discussions and to supplement EPA's understanding of the compliance activities, if any, you have taken at Ardmore Elementary School since the January 30, 2015 inspection, EPA requests that you submit any documentation in your possession or control that identifies measures taken to address the violations identified herein. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed. This information must be submitted, within thirty (30) days of receipt of this NON, to Christine E. Convery (3LC62), Land and Chemicals Division United States Environmental Protection Agency, Region III, 1650 Arch Street, Philadelphia, PA 19103-2029.

If you have additional information relevant to this matter which you believe EPA should consider prior to filing a formal Administrative Complaint, EPA requests that you provide such information, and show cause why an Administrative Complaint should not be issued, within thirty (30) calendar days of receipt of this NON. In addition, EPA invites you to meet with EPA within forty-five (45) calendar days of receipt of this letter to discuss the potential administrative resolution to these violation(s). If you do not respond within thirty (30) calendar days of receipt of this letter or we have not reached a satisfactory administrative resolution of these violations

within ninety (90) calendar days of receipt of this letter, the Agency will determine an appropriate enforcement response without further notice to you.

EPA is enclosing for your information and review a copy of the AHERA regulations, EPA's January 31, 1989 Interim Final Enforcement Response Policy for AHERA, EPA's August 4, 1998 Revision of the AHERA Enforcement Response Policy: Civil Penalties for Failure to Conduct Reinspections, and a copy of 40 C.F.R. Part 19 (entitled "Adjustment of Civil Monetary Penalties for Inflation"). In determining the amount of any penalty to propose in an enforcement action for violations of the Act, TSCA Section 207(a) and (c), 15 U.S.C. §§ 2647(a) and (c), require EPA to take into consideration a violator's culpability, history of previous TSCA violations, ability to pay the penalty, and ability to continue to provide educational services to the community, in addition to such other matters as justice requires (including voluntary disclosure and attitude of the violator).

Please note that TSCA § 207(a), 15 U.S.C. §§ 2647(a), provides that the court shall order that any civil penalty collected under [subsection II of AHERA] be used by the LEA for purposes of complying with AHERA.

In keeping with this provision, EPA's revised Enforcement Response Policy directs that civil penalties which are assessed against LEAs such as PGCSO shall be reduced on a dollar for dollar basis by the cost of compliance with AHERA. As a result, EPA specifically offers you the opportunity to propose one or more TSCA/AHERA compliance projects that the PGCSO may be willing to undertake at the school buildings such that all or a portion of the civil penalties which EPA may propose for the violations documented herein may be used to bring PGCSO back into full compliance with TSCA/AHERA requirements.

For your further information and support, EPA is also enclosing an Information Sheet entitled "U.S. EPA Small Business Resources", which identifies a variety of compliance assistance and other tools available to assist small businesses in complying with Federal and State environmental laws.

Please send any and all information, and direct any request for a settlement conference, to the attention of:

Christine E. Convery
Enforcement Officer
U.S. Environmental Protection Agency - Region III
Land and Chemicals Management Division (3LC62)
1650 Arch Street
Philadelphia, PA 19103-2029

Furthermore, to schedule a settlement conference or if you have any questions concerning this matter, please contact Christine E. Convery at (215) 814-2249.

Sincerely,



Fatima El Abdaoui, Ph.D., Chief
Pesticides and Asbestos Programs Branch

Enclosures

cc: Shauna Garlington Battle, Esq.
Lorraine Anderson, MDE (w/o enclosures)

From: [Convery, Christine](#)
To: [Karen Bowlding](#)
Cc: lorraine.anderson@maryland.gov
Subject: Notice of Non-Compliance
Date: Tuesday, November 17, 2015 4:45:00 PM
Attachments: [Ardmore NONSC 11-17-15.pdf](#)

Ms. Bowlding,

As a courtesy, I'm providing to you an advance copy of a Notice of Non-Compliance and Request to Show Cause letter ("Show Cause") for Ardmore Elementary School (see attached). This letter was sent via certified mail today to Dr. Maxwell and Ms. Garlington Battle, Esq; I anticipate they will receive it Wednesday or Thursday. The letter alleges 3 violations of TSCA-AHERA (asbestos in schools regulations) found as a result of the Maryland Department of Environment (MDE) inspection back in January 2015. As you may or may not be aware, this inspection was performed as a result of more than one tip/complaint to MDE and EPA regarding Ardmore Elementary School's asbestos management.

The violations alleged in the Show Cause are as follows:

1) Failure to perform an inspection

The MDE inspection showed that no documentation (i.e., an architect letter) was available demonstrating that the 1999 addition or the modular classroom were excluded from asbestos inspection requirements. If you have a letter or documentation for either or both of these areas, please provide it in your response to the Show Cause.

2) Failure to perform reinspection

Although Mr. Dallas provided, to me, a signature page with date stating that a 3-yr inspection had been performed, he was not able to provide inspection records for the most recent 3-year reinspection. Mr. Dallas explained PGCPs uses "periodic surveillance" in lieu of 3 year reinspections. I understand this is the practice throughout the school district and this practice is not compliant with TSCA-AHERA. I explained to Mr. Dallas via email and verbally on the phone (around April 2015) that for 3 year reinspections an accredited inspector must visually reinspect and reassess the condition of all known or assumed friable asbestos containing building materials (ACBM), visually inspect previously considered nonfriable ACBM and touch it to determine if it has become friable, identify homogeneous areas of material that have become friable since the last inspection developed required records and submit the records to you (the AHERA Designated Person) within 30 days of reinspection. Further, the records of the inspection must include:

- The date of the reinspection, the name and signature of the person making the reinspection, and accreditation documentation;
- Any changes in the condition of known or assumed asbestos containing building materials;
- Exact location where samples were collected during the reinspection, a description of the manner used to determine sampling locations, the name and signature of each

accredited inspector who collected the samples, and accreditation documentation;

- Any assessments or reassessments made of friable material, the name and signature of the accredited inspector and accreditation documentation; and
- Written recommendations of the management planner.

In the event a 3 year reinspection coincides with a planned 6-month surveillance, you can substitute the 3-year reinspection for a 6-month surveillance, but not the other way around (i.e., 6-month surveillance cannot take the place of a 3-year reinspection, since reinspections are more comprehensive than a 6-month surveillance).

If you would like to see an example of a typical 3-year reinspection report, I will see what I can find for you.

3) Failure to obtain bulk samples

The MDE inspection showed that the following materials in Ardmore Elementary School were not sampled (or assumed to be asbestos in the management plan): 3" black, brown, beige and 4" navy blue vinyl based cove moldings-mastics, veneer and cores of folding partition walls 30-2 and 24-26, stainless sink undercoatings, rope and woven gaskets on two Hurst boilers, navy stage curtain in multi-purpose room.

Feel free to call me to discuss or if you prefer to respond formally through a letter, that's fine too.

Sincerely,

Christine Convery
Compliance and Enforcement Officer | FIFRA Section 7 Coordinator
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: 215-814-2249



Kevin M. Maxwell, Ph.D.
Chief Executive Officer

December 18, 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Fatima El Abdaoui
Pesticides and Asbestos Programs Branch
U.S. Environmental Protection Agency-Region III
Land and Chemicals Division (3LC62)
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Response to Prince George's County Public Schools
Notice of Noncompliance and Request to Show Cause
Case Number: A-16-001 - Ardmore Elementary

Dear Dr. Abdaoui:

The following is our response to Case Number A-16-001 Notice of Noncompliance and Request to Show Cause (undated). It is the position of Prince George's County Public Schools (PGCPS) that to the best of our knowledge, we are in compliance with the Toxic Substance Control Act (TSCA) and the Asbestos Hazard Emergency Response Act (AHERA) as it pertains to the maintenance of the PGCPS Asbestos Management Plans.

An inspector from the Maryland Department of the Environment (MDE) reviewed the PGCPS Asbestos Management Plan and conducted an inspection of Ardmore Elementary School on January 30, 2015. The inspection was conducted due to a complaint received by the school system regarding a broken asbestos-containing floor tile. In addition, the MDE inspector walked the building with Mr. William Dallas, former Environmental Program Specialist and staff who are Environmental Protection Agency accredited inspectors/management planners.

Below are the alleged violations (in the order given in the EPA NON letter) and the district's response to those violations.

Formal Response to Alleged TSCA/EPA Violations

A. Failure to Perform an Inspection

40 C.F.R. § 763.85(a) requires that:

(1) Except as provided in paragraph (a)(2) of this section, before October 12, 1988, local education agencies shall inspect each school building that they lease, own, or otherwise use as a school building to identify all locations of friable and non-friable ACM(2) Any building leased or acquired on or after October 12, 1988, that is to be used as a school building shall be inspected as described under paragraphs (a)(3) and (4) of this section prior to use of a school building.

Response: Ardmore Elementary School Modular Addition - PGCPs has obtained an exclusion letter from Ms. Sarah Woodhead, Director of Capital Improvement Program, PGCPs, for the FY99 Modular Additions. Proof of this letter is included in the appendices of this letter.

B. Failure to Conduct Re-inspections

40 C.F.R. § 763.85(b) requires that:

At least once every 3 years after a management plan is in effect, each local education agency shall conduct a re-inspection of all friable and non-friable known or assumed ACM in each school building that they lease, own, or otherwise use as a school building.

Response: PGCPs completed the initial AHERA asbestos inspection at Ardmore Elementary School in 1988 and completed three year re-inspections in 1990, 1994, 1997, 2000, 2011 and 2014. PGCPs did not complete re-inspections from 2003-2010 due to inspectors being reassigned to address public concern over lead in the water. In response to the concerns, staff tested 17,265 water fixtures at 205 facilities throughout the school system during a multi-phase process. In addition, PGCPs has properly documented in the management plan all accessible asbestos containing materials (Section C), a sample log (Section D), and all 6 month periodic surveillance reports (Section G). Proof of the 2011 and 2014 re-inspections are included in the appendices of this letter.

C. Failure to Collect Bulk Samples

40 C.P.R. § 763.86 provides, *inter alia*, that:

An accredited inspector collect bulk samples from each homogenous area material that is not assumed to be ACM, in accordance with the requirements outlined in 40 C.P.R. §763.86(a) through (d).

Response: PGCPs has responded by sampling the additional materials the MDE inspector noted in his report. Proof of the bulk sampling of each homogenous material noted in the MDE report of suspected asbestos-containing materials is provided in the appendices of this letter. Below lists the materials the MDE inspector noted:

3" black vinyl based cove moldings-mastics

3" brown vinyl based cove moldings-mastics – was not found in the building

3" beige vinyl based cove moldings-mastics

4" navy blue vinyl based cove moldings-mastics

Veneer and cores of folding partition walls 30-2 and 24-26,

Dr. Fatima El Abdaoui
December 18, 2015
Page Three

Stainless sink under coatings
Rope and woven gaskets on two Hurst boilers

The laboratory results indicated that these materials do not contain asbestos. The navy stage curtain in the multi-purpose room will be designated as "assumed positive" and noted in the next management plan update scheduled in 2017.

PGCPS looks forward to presenting evidence of compliance with TSCA/AHERA to you or your designee Ms. Christine E. Convery, Enforcement Officer. If you have any questions or concerns with the content of this report, please contact Mr. Sam Stefanelli, Acting Director of Building Services at 301-952-6500.

Sincerely,



Kevin M. Maxwell, Ph.D.
Chief Executive Officer

KMM:ph:kb

Enclosures

c: Dr. Monica Goldson
Mr. Alvin Collins
Mr. Samuel Stefanelli
Ms. Karen Bowlding



Great By Choice

Sarah Woodhead

Director, Dept. of Capital Programs

December 15, 2015

Ms. Gloria Mikolajczyk, R.A.
School Facilities Architect Supervisor
Public School Construction Program
200 West Baltimore Street, 2nd Floor
Baltimore, Maryland 21201

Re: FY-99 Classroom Addition Project
Asbestos Containing Building Materials Letter

Dear Ms. Mikolajczyk:

The following elementary schools were part of the FY-99 Classroom Addition project. All schools were designed by the same firm (Murray & Associates) and reviewed by the staff of the Department of Capital Programs, Prince George's County Public Schools and the Maryland State Department of General Services. All projects were constructed by the same contractor (Tuckman-Barbee Construction Co., Inc.), using the same materials.

We are unable to locate the ACBM letters for the FY-99 schools with the exception of Barnaby Manor Elementary School, attached. We will continue to look for the ACBM letters.

Allenwood ES
Ardmore ES
Barnaby Manor ES
Calverton ES
Carrollton ES
Glenn Dale ES

Melwood ES
Parkway ES
Tayac ES
University Park ES
William Paca ES

Therefore, to the best of my knowledge, no asbestos containing building materials were specified in the design nor used in the construction of the schools

Sincerely,

Sarah Woodhead
Director

SW:JCF

Attachments

cc: Mr. Rupert McCave
Mr. Mark Thifault
Ms. Karen Bolwinding

Inspection Date and Signatures [763.93 (e) 3 § 5]

Building: Arden Date: 12/2/14

Inspector(s), sample taking personnel & person making assessments.

The qualified inspector who performed the above function was:

Name: Alex Baylor

Signature: Alex Baylor

State of Accreditation: Maryland

Accreditation Number: 125595 (2014)

Inspection Date and Signatures [763.93 (e) 3 § 5]

Building: Ardmore Date: 12/9/2011

Inspector(s), sample taking personnel & person making assessments.

The qualified inspector who performed the above function was:

Name: Alex Baylor

Signature: Alex Baylor

State of Accreditation: Maryland

Accreditation Number: 116200 (2013)

**Prince George's County Public Schools
AHERA Homogeneous Area Assessment**

Building: Ardmore ES

Inspection Date: 12/9/2011

Suspect Material: Floor Tile

Description: 9" x 9" Floor Tile

Type of Material: Misc.

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 38,000 sq

Physical Assessment Code: 5

Response Action Code: 5

Location of Damaged Areas: Throughout

Reason of selecting Assessment Category: non-friable, minor cracks

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/9/2011 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Floor Tile Mastic

Description: Mastic from 9" x 9" Floor Tile

Type of Material: Misc.

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 38,000 sq

Physical Assessment Code: 5

Response Action Code: 5

Location of Damaged Areas: Throughout

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/9/2011 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Pipe Seam Sealant

Description: Black Mastic Seam Sealant

Type of Material: Thermal

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 1,250 lf

Physical Assessment Code: 4

Response Action Code: 5

Location of Damaged Areas: Throughout

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/9/2011 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Pipe Joint Insulation

Description: Mud Elbows

Type of Material: Thermal

Sampled or Assumed: S

Friable or Non-friable: F

Quantity: 250 ea

Physical Assessment Code: 1

Response Action Code: 3

**Prince George's County Public Schools
AHERA Homogeneous Area Assessment**

Location of Damaged Areas: Throughout

Reason of selecting Assessment Category: friable, minor nicks

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/9/2011 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Cement Wall

Description: Cement Wall

Type of Material: Misc

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 200 sqft

Physical Assessment Code: 7

Response Action Code: 5

Location of Damaged Areas: Above ceiling in front of library

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/9/2011 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Wall

Description: Hard Board

Type of Material: Misc

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 300 sqft

Physical Assessment Code: 7

Response Action Code: 5

Location of Damaged Areas: N/A

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/9/2011 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Floor Tile

Description: 12" x 12" Floor Tile

Type of Material: Misc.

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 300 sq

Physical Assessment Code: 5

Response Action Code: 5

Location of Damaged Areas: Lobby

Reason of selecting Assessment Category: non-friable, minor cracks

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

**Prince George's County Public Schools
AHERA Homogeneous Area Assessment**

Schedule for beginning and completing Response Action: The response action was initiated on 12/9/2011 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Floor Tile Mastic

Description: Mastic from 12" x 12" Floor Tile

Type of Material: Misc.

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 300 sq

Physical Assessment Code: 5

Response Action Code: 5

Location of Damaged Areas: Lobby

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/9/2011 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

**Prince George's County Public Schools
AHERA Homogeneous Area Assessment**

Building: Ardmore ES

Inspection Date: 12/2/2014

Suspect Material: Floor Tile

Description: 9" x 9" Floor Tile

Type of Material: Misc.

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 34,000 sq

Physical Assessment Code: 5

Response Action Code: 5

Location of Damaged Areas: Throughout

Reason of selecting Assessment Category: non-friable, minor cracks

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/2/2014 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Floor Tile Mastic

Description: Mastic from 9" x 9" Floor Tile

Type of Material: Misc.

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 34,000 sq

Physical Assessment Code: 5

Response Action Code: 5

Location of Damaged Areas: Throughout

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/2/2014 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Pipe Seam Sealant

Description: Black Mastic Seam Sealant

Type of Material: Thermal

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 1,250 lf

Physical Assessment Code: 4

Response Action Code: 5

Location of Damaged Areas: Throughout

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/2/2014 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Pipe Joint Insulation

Description: Mud Elbows

Type of Material: Thermal

Sampled or Assumed: S

Friable or Non-friable: F

Quantity: 250 ea

Physical Assessment Code: 1

Response Action Code: 3

**Prince George's County Public Schools
AHERA Homogeneous Area Assessment**

Location of Damaged Areas: Throughout

Reason of selecting Assessment Category: friable, minor nicks

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/2/2014 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Cement Wall

Description: Cement Wall

Type of Material: Misc

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 200 sqft

Physical Assessment Code: 7

Response Action Code: 5

Location of Damaged Areas: Above ceiling in front of library

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/2/2014 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Wall

Description: Hard Board

Type of Material: Misc

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 300 sqft

Physical Assessment Code: 7

Response Action Code: 5

Location of Damaged Areas: N/A

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/2/2014 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Floor Tile

Description: 12" x 12" Floor Tile

Type of Material: Misc.

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 300 sq

Physical Assessment Code: 5

Response Action Code: 5

Location of Damaged Areas: Lobby

Reason of selecting Assessment Category: non-friable, minor cracks

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

**Prince George's County Public Schools
AHRA Homogeneous Area Assessment**

Schedule for beginning and completing Response Action: The response action was initiated on 12/2/2014 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.

Suspect Material: Floor Tile Mastix

Description: Mastix from 12" x 12" Floor Tile

Type of Material: Misc.

Sampled or Assumed: S

Friable or Non-friable: NF

Quantity: 300 sq

Physical Assessment Code: 5

Response Action Code: 5

Location of Damaged Areas: Lobby

Reason of selecting Assessment Category: non-friable

Response Action: Repair the material. Schedule the repair based upon factors such as activity level, accessibility, airflow, etc. Repair of this material will be undertaken after completing higher priority response actions. While awaiting repair action, an on-going Operation and Maintenance Program will be initiated.

Schedule for beginning and completing Response Action: The response action was initiated on 12/2/2014 and will continue on an on-going basis until the material is removed.

Operations & Maintenance activities to be followed: Follow the procedures listed for thermal material as listed in the Operations & Maintenance portion of the Management Plan location in Section F.



EMSL ANALYTICAL, INC.
LABORATORY • PRODUCTS • TRAINING

Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

191514540

EMSL ANALYTICAL, INC.
10768 BALTIMORE AVE
BELTSVILLE, MD 20705
PHONE: (301) 937-5700
FAX: (301) 937-5701

Company : Prince George's County Public Schools		EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different If Bill to is Different note instructions in Comments**	
Street: 13300 Old Marlboro Pike, Rm 20A		Third Party Billing requires written authorization from third party	
City: Upper Marlboro	State/Province: MD	Zip/Postal Code: 20772	Country: USA
Report To (Name): Alex Baylor		Fax #: 301-952-6933	
Telephone #: 301-952-0831		Email Address: alex.baylor@pgcps.org	
Project Name/Number: Ardmore ES			
Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email		Purchase Order: 500430	U.S. State Samples Taken:
Turnaround Time (TAT) Options* - Please Check			
<input type="checkbox"/> 3 Hours <input type="checkbox"/> 6 Hours <input type="checkbox"/> 24 Hrs <input type="checkbox"/> 48 Hrs <input checked="" type="checkbox"/> 3 Days <input type="checkbox"/> 4 Days <input type="checkbox"/> 5 Days <input type="checkbox"/> 10 Days			
*For TEM Air 3 hours/6 hours, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.			
PCM - Air <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA PLM - Bulk (reporting limit) <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NIOSH 9002 (<1%)	TEM - Air <input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312 TEM - Bulk <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 TEM - Water: EPA 100.2 Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	TEM- Dust <input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167) Soil/Rock/Vermiculite <input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity) <input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity) <input type="checkbox"/> EPA Protocol (Semi-Quantitative) <input type="checkbox"/> EPA Protocol (Quantitative) Other: <input checked="" type="checkbox"/>	
<input type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group			
Samplers Name: Rodney Curtis		Samplers Signature:	
Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
AE-01	black- cove base	bulk	
AE-01A	black- cove base	bulk	
AE-02	beige- cove base	bulk	
AE-02A	beige- cove base	bulk	
AE-03	blue- cove base	bulk	
AE-03A	blue- cove base	bulk	
AE04	veneer and core partition wall	bulk	
AE-04A	veneer and core partition wall	bulk	
Client Sample # (s):		Total # of Samples: 13	
Relinquished (Client):		Date: 12-4-15	Time:
Received (Lab):		Date: 12/4/15	Time: 1pm
Comments/Special Instructions:			

EMSL ANALYTICAL, INC.
LABORATORY • PRODUCTS • TRAINING**Asbestos Chain of Custody****EMSL Order Number** (Lab Use Only):EMSL ANALYTICAL, INC.
10768 BALTIMORE AVE
BELTSVILLE, MD 20705
PHONE: (301) 937-5700
FAX: (301) 937-5701

Additional Pages of the Chain of Custody are only necessary if needed for additional sample information

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
AE-05	woven gasket boiler #1	bulk	
AE-05A	woven gasket boiler #2	bulk	
AE-06	sink undercoating room 26	bulk	
AE-07	veneer and core partition wall	bulk	
AE-07A	veneer and core partition wall	bulk	
*Comments/Special Instructions:			

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191514540

CustomerID: PGCS62

CustomerPO: 500430

ProjectID:

Attn: **Alex Baylor**
Prince George's County School
13300 Old Marlboro Pike
Upper Marlboro, MD 20772

Phone: (301) 952-6559
Fax: (301) 952-0346
Received: 12/04/15 1:00 PM
Analysis Date: 12/4/2015
Collected: 12/4/2015

Project: **ARDMORE ES**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
AE-01-Cove Base 191514540-0001	BLK. COVEBASE	Black Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-fibrous (other)	None Detected
AE-01-Mastic 191514540-0001B	BLK. COVEBASE	Brown Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (other)	None Detected
AE-01A-Cove Base 191514540-0002	BLK. COVEBASE	Black Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-fibrous (other)	None Detected
AE-01A-Mastic 191514540-0002B	BLK. COVEBASE	Brown Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (other)	None Detected
AE-02-Cove Base 191514540-0003	BEIGE COVEBASE	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (other)	None Detected
AE-02-Mastic 191514540-0003A	BEIGE COVEBASE	Brown Non-Fibrous Homogeneous	3% Cellulose 2% Synthetic	95% Non-fibrous (other)	None Detected
AE-02A-Cove Base 191514540-0004	BEIGE COVEBASE	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (other)	None Detected
AE-02A-Mastic 191514540-0004A	BEIGE COVEBASE	Brown Non-Fibrous Homogeneous	2% Cellulose 3% Synthetic	95% Non-fibrous (other)	None Detected
AE-03-Cove Base 191514540-0005	BLUE COVEBASE	Blue Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (other)	None Detected

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Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/04/2015 16:39:47

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191514540

CustomerID: PGCS62

CustomerPO: 500430

ProjectID:

Attn: **Alex Baylor**
Prince George's County School
13300 Old Marlboro Pike
Upper Marlboro, MD 20772

Phone: (301) 952-6559
 Fax: (301) 952-0346
 Received: 12/04/15 1:00 PM
 Analysis Date: 12/4/2015
 Collected: 12/4/2015

Project: **ARDMORE ES**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
AE-03-Mastic 191514540-0005A	BLUE COVEBASE	Tan Non-Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (other)	None Detected
AE-03A-Cove Base 191514540-0006	BLUE COVEBASE	Blue Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (other)	None Detected
AE-03A-Mastic 191514540-0006A	BLUE COVEBASE	Tan Non-Fibrous Homogeneous	3% Cellulose	97% Non-fibrous (other)	None Detected
AE-04-Veener 191514540-0007	VENEER & CORE PARTITION WALL	Tan/White Non-Fibrous Homogeneous		35% Ca Carbonate 65% Non-fibrous (other)	None Detected
AE-04-Core Partition 191514540-0007A	VENEER & CORE PARTITION WALL	Brown Fibrous Homogeneous	85% Cellulose	15% Non-fibrous (other)	None Detected
AE-04A-Veener 191514540-0008	VENEER & CORE PARTITION WALL	Tan/White Non-Fibrous Homogeneous		40% Ca Carbonate 60% Non-fibrous (other)	None Detected
AE-04A-Core Partition 191514540-0008A	VENEER & CORE PARTITION WALL	Brown Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (other)	None Detected
AE-05 191514540-0009	WOVEN GASKET BOILER 1	White Fibrous Homogeneous	95% Glass	5% Non-fibrous (other)	None Detected
AE-05A 191514540-0010	WOVEN GASKET BOILER 2	White Non-Fibrous Homogeneous	90% Glass	10% Non-fibrous (other)	None Detected

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 Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/04/2015 16:39:47

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191514540

CustomerID: PGCS62

CustomerPO: 500430

ProjectID:

Attn: **Alex Baylor**
Prince George's County School
13300 Old Marlboro Pike
Upper Marlboro, MD 20772

Phone: (301) 952-6559
Fax: (301) 952-0346
Received: 12/04/15 1:00 PM
Analysis Date: 12/4/2015
Collected: 12/4/2015

Project: **ARDMORE ES**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
AE-06 191514540-0011	SINK UNDERCOATING RM 26	Black Non-Fibrous Homogeneous	22% Cellulose	5% Mica 73% Non-fibrous (other)	None Detected
AE-07-Veener 191514540-0012	veneer & CORE PARTITION WALL	Tan/White Fibrous Heterogeneous	10% Cellulose	40% Ca Carbonate 50% Non-fibrous (other)	None Detected
AE-07-Core Partition 191514540-0012A	veneer & CORE PARTITION WALL	Brown Fibrous Homogeneous	85% Cellulose	15% Non-fibrous (other)	None Detected
AE-07A-Veener 191514540-0013	veneer & CORE PARTITION WALL	Tan/White Fibrous Heterogeneous	12% Cellulose	35% Ca Carbonate 53% Non-fibrous (other)	None Detected
AE-07A-Core Partition 191514540-0013A	veneer & CORE PARTITION WALL	Brown Fibrous Homogeneous	85% Cellulose	15% Non-fibrous (other)	None Detected

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/04/2015 16:39:47

**EMSL Analytical, Inc.**

10768 Baltimore Avenue, Beltsville, MD 20705

Phone/Fax: (301) 937-5700 / (301) 937-5701

<http://www.EMSL.com>beltsvillelab@emsl.com

EMSL Order: 191514540

CustomerID: PGCS62

CustomerPO: 500430

ProjectID:

Attn: **Alex Baylor**
Prince George's County School
13300 Old Marlboro Pike
Upper Marlboro, MD 20772

Phone: (301) 952-6559
Fax: (301) 952-0346
Received: 12/04/15 1:00 PM
Analysis Date: 12/4/2015
Collected: 12/4/2015

Project: **ARDMORE ES**

The samples in this report were submitted to EMSL for analysis by Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy. The reference number for these samples is the EMSL Order ID above. Please use this reference number when calling about these samples.

Report Comments:

Sample Receipt Date::	12/4/2015	Sample Receipt Time:	1:00 PM
Analysis Completed Date:	12/4/2015	Analysis Completed Time:	4:23 PM

Analyst(s):

Luba Stockert PLM (23)**Samples reviewed and approved by:**

Joe Centifonti, Laboratory Manager
or other approved signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by EMSL Analytical, Inc. Beltsville, MD NVLAP Lab Code 200293-0

Initial report from 12/04/2015 16:39:47

From: [Convery, Christine](#)
To: [Karen Bowlding](#)
Subject: RE: Notice of Non-Compliance
Date: Monday, February 22, 2016 2:29:00 PM

Good afternoon Karen,

Are you able to meet with me via phone to discuss your response to the Show Cause (Ardmore Elementary)? I am open most of the week of March 7th, do you have any available times that week – maybe set aside 1 hour, but it will probably take less time.

Thanks,
Christine

Christine Convery
Compliance and Enforcement Officer | FIFRA Section 7 Coordinator
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: 215-814-2249

From: Karen Bowlding [mailto:karen.bowlding@pgcps.org]
Sent: Monday, January 11, 2016 12:11 PM
To: Convery, Christine <Convery.Christine@epa.gov>
Subject: Re: Notice of Non-Compliance

See attached documents...

Please let me know if I need to send you anything else or if the attached information settles the issue.

Karen

On Mon, Jan 11, 2016 at 11:32 AM, Convery, Christine <Convery.Christine@epa.gov> wrote:

I did not receive it. Do you know if it was mailed USPS, FedEx?

From: Karen Bowlding [mailto:karen.bowlding@pgcps.org]
Sent: Monday, January 11, 2016 11:25 AM
To: Convery, Christine <Convery.Christine@epa.gov>
Subject: Re: Notice of Non-Compliance

It was mailed out before the break...

On Mon, Jan 11, 2016 at 11:19 AM, Convery, Christine <Convery.Christine@epa.gov>

wrote:

Karen,
Checking in on the status of your response.
Thanks,
Christine

From: Karen Bowlding [mailto:karen.bowlding@pgcps.org]

Sent: Tuesday, December 01, 2015 9:22 AM

To: Convery, Christine <Convery.Christine@epa.gov>

Subject: Re: Notice of Non-Compliance

Christine,

We will respond to this before the winter break...working on it now.

Karen

On Tue, Nov 17, 2015 at 4:45 PM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Ms. Bowlding,

As a courtesy, I'm providing to you an advance copy of a Notice of Non-Compliance and Request to Show Cause letter ("Show Cause") for Ardmore Elementary School (see attached). This letter was sent via certified mail today to Dr. Maxwell and Ms. Garlington Battle, Esq; I anticipate they will receive it Wednesday or Thursday. The letter alleges 3 violations of TSCA-AHERA (asbestos in schools regulations) found as a result of the Maryland Department of Environment (MDE) inspection back in January 2015. As you may or may not be aware, this inspection was performed as a result of more than one tip/complaint to MDE and EPA regarding Ardmore Elementary School's asbestos management.

The violations alleged in the Show Cause are as follows:

- 1) Failure to perform an inspection

The MDE inspection showed that no documentation (i.e., an architect letter) was available demonstrating that the 1999 addition or the modular classroom were excluded from asbestos inspection requirements. If you have a letter or documentation for either or both of these areas, please provide it in your response to the Show Cause.

- 2) Failure to perform reinspection

Although Mr. Dallas provided, to me, a signature page with date stating that a 3-yr inspection had been performed, he was not able to provide inspection records for the most recent 3-year reinspection. Mr. Dallas explained PGCPs uses "periodic

surveillance” in lieu of 3 year reinspections. I understand this is the practice throughout the school district and this practice is not compliant with TSCA-AHERA. I explained to Mr. Dallas via email and verbally on the phone (around April 2015) that for 3 year reinspections an accredited inspector must visually reinspect and reassess the condition of all known or assumed friable asbestos containing building materials (ACBM), visually inspect previously considered nonfriable ACBM and touch it to determine if it has become friable, identify homogeneous areas of material that have become friable since the last inspection developed required records and submit the records to you (the AHERA Designated Person) within 30 days of reinspection. Further, the records of the inspection must include:

- The date of the reinspection, the name and signature of the person making the reinspection, and accreditation documentation;
- Any changes in the condition of known or assumed asbestos containing building materials;
- Exact location where samples were collected during the reinspection, a description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, and accreditation documentation;
- Any assessments or reassessments made of friable material, the name and signature of the accredited inspector and accreditation documentation; and
- Written recommendations of the management planner.

In the event a 3 year reinspection coincides with a planned 6-month surveillance, you can substitute the 3-year reinspection for a 6-month surveillance, but not the other way around (i.e., 6-month surveillance cannot take the place of a 3-year reinspection, since reinspections are more comprehensive than a 6-month surveillance).

If you would like to see an example of a typical 3-year reinspection report, I will see what I can find for you.

3) Failure to obtain bulk samples

The MDE inspection showed that the following materials in Ardmore Elementary School were not sampled (or assumed to be asbestos in the management plan): 3” black, brown, beige and 4” navy blue vinyl based cove moldings-mastics, veneer and cores of folding partition walls 30-2 and 24-26, stainless sink undercoatings, rope and woven gaskets on two Hurst boilers, navy stage curtain in multi-purpose room.

Feel free to call me to discuss or if you prefer to respond formally through a letter, that’s fine too.

Sincerely,

Christine Convery
Compliance and Enforcement Officer | FIFRA Section 7 Coordinator
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: [215-814-2249](tel:215-814-2249)

--

Mrs. Karen Bowlding, Acting Environmental Program Specialist

Prince Georges County Public Schools | Division of Supporting Services | Environmental Office

karen.bowlding@pgcps.org | Office: [301.952.0831](tel:301.952.0831) or Ext. 38434 | Cell: [240.464.2219](tel:240.464.2219)

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3/7/14

Karen Bunting

Alex Baylor.

- ①
- letter not avail @ time of inspection
 - one letter done
 - don't have paper
 - all schools have same building

School + modular → connected not separate buildings.
→ directly connected.

- ② Alex
- physical assessment sheets → updated every 3 years.

every 3 yrs, update drawings to show any sampling
update cover sheet
cost estimates → to do removals.

Phys Assessment code: 5 non friab ^{ACBM to/potential for damage}
RA code: 5. "left in place indefinite"

1	5	7 highest] from regulation
damaged ory. damaged		any remain friable / remaining.	

~~Assessment done in last~~

Karen

- ☐ Send a long receipt.
- ☐ Byr. reinspiration? Ask Rich

Prepare SCAFO

Shauna Battle

From: [Karen Bowlding](#)
To: [Convery, Christine](#)
Subject: Re: Notice of Non-Compliance
Date: Thursday, March 17, 2016 10:09:25 AM
Attachments: [removed.txt](#)
[Abatement Costs - Vendor 3-14-2016.pdf](#)

Hi Christine,

Please see attached.

Karen

On Wed, Mar 16, 2016 at 1:46 PM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Karen,

Please send the vendor list and the types of work that were done by each, including \$ spent.

I'm close to having a response for you about the 3-year inspections.

Thanks,

Christine

From: Karen Bowlding [mailto:karen.bowlding@pgcps.org]

Sent: Wednesday, March 16, 2016 1:00 PM

To: Convery, Christine <Convery.Christine@epa.gov>

Subject: Re: Notice of Non-Compliance

Good Afternoon,

I have the vendor list with the abatement costs. Do you want that or just the total amount spent?

Karen

On Mon, Mar 7, 2016 at 9:44 AM, Karen Bowlding <karen.bowlding@pgcps.org> wrote:

Good Morning,

Ardmore has only one building. Are we able to off set the fine with the amount of money spent on abatement throughout the school year?

Karen

On Mon, Mar 7, 2016 at 9:41 AM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Karen,

I'll be calling at 10AM. I'd like to discuss your response to the Show Cause and the documents your provided – just to clarify exactly what you provided as well as EPA's position regarding the alleged violations.

Assuming that EPA proceeds with all of the violations alleged in the Show Cause, I have provided below a calculation of the penalty. We can discuss on the phone, but it is my understanding that Ardmore has two school buildings. The maximum penalty is \$7500 x # school buildings = \$15000.

Violations	Viol Level	# School bldgs	Penalty per bldg	Total Penalty Per Viol	Inflation/Total Penalty	Max Penalty Allowed	Final School Penalty
Failed to perform 3-yr reinspection (40 CFR 763.85(b))	1	2	5000	10000	14163		
Failed to inspect (or get exclusion) [40 CFR 763.85 (a)]	1	2	5000	10000	14163		
Failed to sample or assume [40 CFR 763.86]	1	2	5000	10000	14163		
					42489	15000	\$15,000

0.15 discount

\$15,000

2250

\$12,750

From: Convery, Christine

Sent: Thursday, February 25, 2016 11:12 AM

To: 'Karen Bowlding' <karen.bowlding@pgcps.org>

Subject: RE: Notice of Non-Compliance

Ok, great. I have put it on my calendar.

From: Karen Bowlding [<mailto:karen.bowlding@pgcps.org>]

Sent: Thursday, February 25, 2016 7:15 AM

To: Convery, Christine <Convery.Christine@epa.gov>

Subject: Re: Notice of Non-Compliance

That day and time is fine. Our office number is [301.952.6760](tel:301.952.6760).

Karen

On Thu, Feb 25, 2016 at 6:41 AM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Karen,

Monday the 7th works for me. How about 10am? If that's not good I'm open all day as of right now.

Christine

From: Karen Bowlding [<mailto:karen.bowlding@pgcps.org>]

Sent: Monday, February 22, 2016 2:40 PM

To: Convery, Christine <Convery.Christine@epa.gov>

Subject: Re: Notice of Non-Compliance

Chrisitine,

I'm available on the 7th anytime and 8th before noon.

Karen

On Mon, Feb 22, 2016 at 2:30 PM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Good afternoon Karen,

Are you able to meet with me via phone to discuss your response to the Show Cause (Ardmore Elementary)? I am open most of the week of March 7th, do you have any available times that week – maybe set aside 1 hour, but it will probably take less time.

Thanks,

Christine

Christine Convery

Compliance and Enforcement Officer | FIFRA Section 7 Coordinator

Pesticides and Asbestos Programs Branch | EPA Region 3

1650 Arch Street | Philadelphia, PA 19103

Phone: [215-814-2249](tel:215-814-2249)

From: Karen Bowlding [mailto:karen.bowlding@pgcps.org]

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To: Convery, Christine <Convery.Christine@epa.gov>

Subject: Re: Notice of Non-Compliance

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To: Convery, Christine <Convery.Christine@epa.gov>

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To: Convery, Christine <Convery.Christine@epa.gov>

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Feel free to call me to discuss or if you prefer to respond formally through a letter, that's fine too.

Sincerely,

Christine Convery

Compliance and Enforcement Officer | FIFRA Section 7 Coordinator

Pesticides and Asbestos Programs Branch | EPA Region 3

1650 Arch Street | Philadelphia, PA 19103

Phone: [215-814-2249](tel:215-814-2249)

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Mrs. Karen Bowlding, Acting Environmental Program Specialist

Prince Georges County Public Schools | Division of Supporting Services | Environmental Office

karen.bowlding@pgcps.org | Office: [301.952.0831](tel:301.952.0831) or Ext. 38434 | Cell: [240.464.2219](tel:240.464.2219)

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Prince George's County Public Schools - Division of Supporting Services - Environmental Office
Asbestos Abatement Project Costs

			1,218,826.96	TOTAL JAN 2015-2015		
Period	Line Description	AP Vendor Name	Invoice Number	Amount	Effective Date	Creation Date
14-Aug	(FY15 MR) IFB 112-14 exp 7/31/14: Arrowhead ES - Asbestos Abatement, Proposal Dated 7/22/14	A & I INC	20790	8,700.00	26-Aug-14	26-Aug-14
14-Aug	(FY15 MR) HCPS Bid #14-JHC-005 10/31/14: Heather Hills ES - Asbestos Abatement in Kitchen and Surrounding Areas, Proposal Dated 6/12/14	A & I INC	20791	10,800.00	25-Aug-14	26-Aug-14
14-Aug	(FY15 AR) HCPS Bid #14-JHC-005 10/31/14: Langley Park McCormick ES - Asbestos Abatement, Proposal Submitted 5/23/14	A & I INC	20773	2,150.00	26-Aug-14	26-Aug-14
15-Aug	(FY15 MS) IFB 112-14 exp. 7/31/17, Central High School, Asbestos Abatement Room 5, Proposal Dated 11/28/14	A & I INC	21204	2,200.00	5-Aug-15	5-Aug-15
14-Dec	(FY15 MS) IFB 112-14 exp. 7/31/17, Heather Hills ES, Asbestos Abatement, Library Area, Invoice 21075	A & I INC	21075	12,225.00	15-Dec-14	15-Dec-14
14-Dec	(FY15 MS) IFB 112-14 exp. 7/31/17, Pointer Ridge ES, Asbestos Abatement, Wing 1, Room 3, Invoice 21082	A & I INC	21082	10,250.00	18-Dec-14	18-Dec-14
15-Jan	Adelphi ES, remove damaged pipe insulation and re-insulate, various areas.	A & I INC	20977	885	30-Jan-15	30-Jan-15
15-Jan	Dwight D. Eisenhower, in-insulate valves & pipe, various rooms	A & I INC	20972	2,795.00	30-Jan-15	30-Jan-15
15-Jan	Catherine T. Reed, insulate chilled water, boiler rm, building supr room, hallway by rm 23, floor units in K-1, K-11, K-13.	A & I INC	20974	3,850.00	30-Jan-15	30-Jan-15
15-Jan	High Bridge ES, carpet, floor tile, mastic, data room	A & I INC	20981	5,925.00	30-Jan-15	30-Jan-15
15-Jan	(FY15 MS) IFB 112-14 exp. 7/31/17, William Paca ES, Asbestos Abatement, Ramp & Lobby Entrance, Proposal Dated 11/28/14	A & I INC	21199	5,950.00	14-Jan-15	14-Jan-15
15-Jan	(FY15 MS) IFB 112-14 exp. 7/31/17, Ardmore ES, Asbestos Abatement & Replacement, Two Classrooms & Hallway	A & I INC	21198	14,950.00	14-Jan-15	14-Jan-15
14-Oct	(FY15 MS) IFB 112-14 exp. 7/31/17: High Point HS Annex, Asbestos Abatement in Annex Office, Proposal Dated 9/12/14	A & I INC	20932	7,450.00	21-Oct-14	21-Oct-14
14-Sep	(FY15 MR) IFB 112-14 exp 7/31/14: Fairmont Heights HS - Asbestos Abatement in Various Areas, Invoice 20867	A & I INC	20867	6,400.00	18-Sep-14	18-Sep-14
14-Sep	(FY15 MR) HCPS Bid #14-JHC-005 10/31/14: Heather Hills ES - Asbestos Abatement in Room 1, Invoice 20792	A & I INC	20792	4,725.00	12-Sep-14	12-Sep-14
14-Sep	(FY15 MR) HCPS Bid #14-JHC-005 10/31/14: Isaac Gourdine MS - Asbestos Abatement, Proposal Dated 8/6/14	A & I INC	20833	3,250.00	16-Sep-14	16-Sep-14
14-Sep	(FY15 MR) HCPS Bid #14-JHC-005 10/31/14: DuVal HS - Asbestos Abatement, Proposal Dated 6/20/14	A & I INC	20832	3,300.00	16-Sep-14	16-Sep-14
14-Sep	(FY15 MR) IFB 112-14 exp 7/31/17: Annapolis Road - Asbestos Abatement Room 109, Invoice 8/13/14	A & I INC	20789	3,800.00	16-Sep-14	16-Sep-14
15-Dec	FY16 Environmental - Labor, material, equipment and supervision necessary to remove and dispose of carpet and floor tile with no mastic @ Heather Hills ES, Invoice 021779	A & I INC	21779	12,500.00	9-Dec-15	9-Dec-15
15-Dec	FY16 Environmental - remove and replace 250 SF of flooring with mastic and remove and reinsulate pipe in storage closet, inv 021780	A & I INC	21780	6,300.00	9-Dec-15	9-Dec-15
15-Dec	FY16 Environmental - remove pipe insulation and mastic in rooms 9, 17, 18 and main office @ Baden ES, invoice 021778	A & I INC	21778	6,820.00	9-Dec-15	9-Dec-15
15-Dec	FY16 Environmental - Remove VAT and mastic and 2 areas of ceiling tile, removal of VAT and mastic in multipurpose room @ Francis T Evans, invoice 021777	A & I INC	21777	37,550.00	17-Dec-15	17-Dec-15
15-Oct	FY16 Environmental - A&I; Labor, material, equipment and supervision to remove carpet, VAT, and mastic @ Arrowhead ES; inv 021790	A & I INC	21790	24,700.00	15-Oct-15	15-Oct-15
15-Sep	FY16 Asbestos - A&I - Cherokee Lane - Kitchen	A & I INC	21705	2,350.00	22-Sep-15	22-Sep-15
				105,875.00		
14-Oct	(FY15 AR) IFB 112-14 exp 7/31/17: Tall Oaks HS, Asbestos Abatement in Guidance Office Suites & Teacher's Lounge, Proposal Dated 9/5/14	ACM Services, Inc.	20224-1GG	4,765.00	1-Oct-14	1-Oct-14
16-Jan	(FY16) Environmental - Ceiling tile abatement @ Parkdale HS - Media Center	ACM Services, Inc.	22075.1JM	11,000.00	11-Jan-16	11-Jan-16
				11,000.00		

14-Aug	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: William Wirt MS - Asbestos Abatement, Proposal Dated 6/17/14	ASBESTOS SPECIALISTS INC	19729	3,200.00	12-Aug-14	12-Aug-14
14-Aug	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Kenmoor MS - Asbestos Abatement of Teachers Lounge, Proposal Dated 6/10/14	ASBESTOS SPECIALISTS INC	19734	3,300.00	13-Aug-14	13-Aug-14
14-Aug	(FY15 AR) FCPS Bid 14M6 1/31/16: Margaret Brent - Asbestos Abatement MP Room, Proposal Dated 4/23/14	ASBESTOS SPECIALISTS INC	19732	5,200.00	13-Aug-14	13-Aug-14
14-Aug	(FY15 AR) FCPS Bid 14M6 1/31/16: Martin L King MS - Asbestos Abatement of MP Room, Proposal Dated 4/23/14	ASBESTOS SPECIALISTS INC	19728	9,900.00	13-Aug-14	13-Aug-14
14-Aug	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Springhill Lake ES - Asbestos Abatement, Invoice 19753	ASBESTOS SPECIALISTS INC	19753	25,600.00	26-Aug-14	26-Aug-14
14-Aug	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Oxon Hill MS - Asbestos Abatement of Main Office, Proposal Dated 6/25/14	ASBESTOS SPECIALISTS INC	19816	5,800.00	26-Aug-14	26-Aug-14
14-Aug	(FY15 AR) FCPS Bid 14M6 11/31/16: Lamont ES - Asbestos Abatement in Hallways, Proposal Dated 4/24/14	ASBESTOS SPECIALISTS INC	19837	7,700.00	25-Aug-14	26-Aug-14
14-Aug	(FY15 AR) Rider for FCPS Bid 14M6 1/31/16: Highbridge ES - Asbestos Abatement of Hallways, Proposal Dated 7/14/14	ASBESTOS SPECIALISTS INC	19838	9,800.00	25-Aug-14	26-Aug-14
14-Aug	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Robert Goddard FI - Asbestos Abatement in Kitchen PCO #1, Proposal Dated 8/6/14	ASBESTOS SPECIALISTS INC	19829	2,950.00	25-Aug-14	26-Aug-14
14-Aug	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Seabrook ES - Asbestos Abatement of Kitchen Area, Proposal dated 6/30/14	ASBESTOS SPECIALISTS INC	19780	3,800.00	25-Aug-14	26-Aug-14
14-Aug	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Robert Goddard FI - Asbestos Abatement of Kitchen and Surrounding Areas, Proposal Dated 6/30/14	ASBESTOS SPECIALISTS INC	19829	5,900.00	25-Aug-14	26-Aug-14
15-Jan	(FY15 AR) IFB 112-14 exp 7/31/17: Sasscer - Proposal Dated 7/28/14, Room 210 Offices, Asbestos Abatement	ASBESTOS SPECIALISTS INC	20266	9,600.00	29-Jan-15	29-Jan-15
15-Jan	(FY15 MS) IFB 112-14 exp. 7/31/17: Sasscer Office 202E, Asbestos Abatement, Proposal Dated 11/20/14	ASBESTOS SPECIALISTS INC	20266	2,350.00	29-Jan-15	29-Jan-15
15-Jan	(FY15 MS) IFB 112-14 exp. 7/31/17: Sasscer Office 202D, Asbestos Abatement, Proposal Dated 11/14/14	ASBESTOS SPECIALISTS INC	20266	4,450.00	29-Jan-15	29-Jan-15
15-Jan	(FY15 MS) IFB 112-14 exp. 7/31/17: Sump Pit Debris Cleanup, Proposal Dated 11/11/14	ASBESTOS SPECIALISTS INC	20270	12,050.00	29-Jan-15	29-Jan-15
15-Jan	(FY15 MS) IFB 112-14 exp. 7/31/17: Largo HS, Asbestos Abatement of Administrative Office Near Room 152, Proposal Dated 12/2/14	ASBESTOS SPECIALISTS INC	20280	18,500.00	29-Jan-15	29-Jan-15
15-Jan	(FY15 MS) IFB 112-14 exp. 7/31/17: Largo HS, Asbestos Abatement Rooms 152, 158, 159, 160, 161 & Hallway, Proposal Dated 11/18/14	ASBESTOS SPECIALISTS INC	20280	162,000.00	29-Jan-15	29-Jan-15
14-Nov	(FY15 AR) IFB 112-14 exp 7/31/17: Sasscer - Removal/Replacement, Asbestos Abatement of Ceiling Tile, Invoice 19588	ASBESTOS SPECIALISTS INC	19588	12,250.00	19-Nov-14	19-Nov-14
14-Oct	(FY15 AR) IFB 112-14 exp 7/31/17: Kenmoor MS - Removal/Replacement, Asbestos Abatement of Ceiling Tile, Proposal Dated 9/22/14	ASBESTOS SPECIALISTS INC	20001	4,900.00	13-Oct-14	13-Oct-14
14-Oct	(FY15 AR) IFB 112-14 exp 7/31/17: Kenmoor MS - Removal/Replacement, Asbestos Abatement of Ceiling Tile, Proposal Dated 9/3/14	ASBESTOS SPECIALISTS INC	20001	58,000.00	13-Oct-14	13-Oct-14
15-Oct	(FY15 MS) IFB 112-14 exp 7/31/17: North Forestville, CR 105, Demolish & Asbestos Abatement, Proposal Dated 1-20-15	ASBESTOS SPECIALISTS INC	20375	5,500.00	2-Oct-15	3-Oct-15
14-Sep	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Thomas Pullen - Asbestos Abatement, Proposal Dated 7/7/14	ASBESTOS SPECIALISTS INC	19833	19,800.00	12-Sep-14	12-Sep-14
14-Sep	(FY15 AR) Change Order to Add Funds to PO 586309: IFB 112-14 exp 7/31/14: Thomas Pullen ES, Water Damaged Drywall & Mold Remediation, Proposal 8/5/14	ASBESTOS SPECIALISTS INC	19833	15,800.00	12-Sep-14	12-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/17: Thomas Pullen ES - Mold Remediation, Proposal dated 8/1/14	ASBESTOS SPECIALISTS INC	19833	49,800.00	12-Sep-14	12-Sep-14
14-Sep	(FY15 AR) Change Order to Add Funds to PO 586093: IFB 112-14 exp 7/31/17: North Forestville ES - Additional Funds Needed for Asbestos Abatement of Main Office/Copy Room	ASBESTOS SPECIALISTS INC	19874	1,575.00	12-Sep-14	12-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/17: North Forestville ES - Asbestos Abatement, Proposal Dated 8/12/14	ASBESTOS SPECIALISTS INC	19874	3,400.00	12-Sep-14	12-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/17: Asbestos Abatement and Mold Remediation in Principals Office, Invoice 19843	ASBESTOS SPECIALISTS INC	19843	6,950.00	16-Sep-14	16-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/17: Drew Freeman MS - Asbestos Abatement Room 106, Proposal Dated 8/14/14	ASBESTOS SPECIALISTS INC	19896	9,490.00	16-Sep-14	16-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/17: John Bayne ES - Asbestos Abatement in Computer Lab & Room 204, Proposal Dated 8/14/14	ASBESTOS SPECIALISTS INC	19897	14,500.00	16-Sep-14	16-Sep-14
14-Sep	(FY15AR) Change Order to Add Funds to PO 584446 - Asbestos Abatement, Proposal Dated 8/8/14	ASBESTOS SPECIALISTS INC	19862	1,200.00	8-Sep-14	8-Sep-14
14-Sep	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Yorktown ES - Asbestos Abatement, Hallway Floor & Ceiling Tile, Proposal Dated 8/6/14	ASBESTOS SPECIALISTS INC	19867	3,450.00	8-Sep-14	8-Sep-14
14-Sep	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Walker Mill MS - Asbestos Abatement of Guidance Office & Conference Room, Proposal Dated 7/16/14	ASBESTOS SPECIALISTS INC	19862	3,800.00	8-Sep-14	8-Sep-14
14-Sep	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Yorktown ES - Asbestos Abatement, Proposal Dated 6/24/14	ASBESTOS SPECIALISTS INC	19867	10,800.00	8-Sep-14	8-Sep-14
14-Sep	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Potomac HS - Asbestos Abatement of Classroom #108, Proposal Dated 7/16/14	ASBESTOS SPECIALISTS INC	19866	4,200.00	8-Sep-14	8-Sep-14

14-Sep	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Bowie HS - Asbestos Abatement of Room 126, Proposal Dated 7/28/14	ASBESTOS SPECIALISTS INC	19868	6,900.00	8-Sep-14	8-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/14: Robert Goddard FI - Miscellaneous Asbestos Abatement, Proposal Dated 8/25/14	ASBESTOS SPECIALISTS INC	19906	2,900.00	16-Sep-14	16-Sep-14
14-Sep	(FY15 AR) Rider Contract for FCPS Bid 14M6 1/31/16: Capitol Heights ES - Asbestos Abatement in Media Center, Proposal Dated 7/30/14	ASBESTOS SPECIALISTS INC	19898	4,900.00	16-Sep-14	16-Sep-14
15-Sep	(FY15 MS) IFB 112-14 exp 7/31/17: North Forestville, CR 105, Demolish & Asbestos Abatement, Proposal Dated 1-20-15	ASBESTOS SPECIALISTS INC	20397	2,200.00	24-Sep-15	24-Sep-15
15-Sep	(FY15 MS) IFB 112-14 exp. 7/31/17: Suitland HS, Asbestos Abatement of Attendance Office, Suite 110 & Mechanical Room 107, Proposal Dated 12/2/14	ASBESTOS SPECIALISTS INC	20859	13,900.00	2-Sep-15	2-Sep-15
15-Dec	(FY16 Environmental) FAB Storage Trailer, Monthly Rent	ASBESTOS SPECIALISTS INC	21165	85	4-Dec-15	4-Dec-15
16-Feb	(FY16) Environmental - Floor tile and mastic abatement and tile re-install in office areas @ Largo HS, Main office, weight room and admn 2	ASBESTOS SPECIALISTS INC	21311	14,440.00	4-Feb-16	4-Feb-16
16-Feb	(FY16) Environmental - Provide asbestos abatement services required @ Largo HS hallways classroom 132-C10 ceiling tile and pip insulation, invoice 20964	ASBESTOS SPECIALISTS INC	20964	52,555.00	4-Feb-16	4-Feb-16
16-Jan	(FY16) Environmental - Asbestos abatement @ North Forestville ES, Room 111	ASBESTOS SPECIALISTS INC	21267	3,950.00	28-Jan-16	28-Jan-16
16-Jan	(FY16 Environmental) FAB Storage Trailer, Monthly Rent	ASBESTOS SPECIALISTS INC	21319	85	14-Jan-16	14-Jan-16
16-Jan	(FY16 Environmental) FAB Storage Trailer, Monthly Rent	ASBESTOS SPECIALISTS INC	21259	85	6-Jan-16	6-Jan-16
16-Jan	(FY16) Environmental - Provide emergency asbestos abatement required @ Largo HS, Base pricing proposal 8/19/15, Invoice 20963	ASBESTOS SPECIALISTS INC	20963	2,795.00	11-Jan-16	11-Jan-16
16-Jan	FY16 Asbestos - ASI-Largo HS Classrooms 138-140-151-117-119	ASBESTOS SPECIALISTS INC	20963	34,400.00	11-Jan-16	11-Jan-16
16-Mar	(FY16 Environmental) FAB Storage Trailer, Monthly Rent	ASBESTOS SPECIALISTS INC	21405	85	4-Mar-16	4-Mar-16
15-Nov	(FY16 Environmental) FAB Storage Trailer, Monthly Rent	ASBESTOS SPECIALISTS INC	21081	85	16-Nov-15	16-Nov-15
15-Oct	FY16 Asbestos Removal- Largo HS Teacher's Lounge Floor Tile PCO#1	ASBESTOS SPECIALISTS INC	20908	4,750.00	14-Oct-15	14-Oct-15
15-Oct	FY16 ARRT- Largo HS Classrooms & Hallways, Ceiling Tile, Fireproofing & Floor Tile Asbestos Abatement PCO#3	ASBESTOS SPECIALISTS INC	20908	5,630.00	14-Oct-15	14-Oct-15
15-Oct	FY16 ARRT - Largo HS- Classroom & Hallways Ceiling Tile, Fireproofing & Floor Tile Asbestos Abatement PCO#2	ASBESTOS SPECIALISTS INC	20908	39,750.00	14-Oct-15	14-Oct-15
15-Oct	FY16 Environmental - Asbestos Specialists, provide asbestos abatement services required for Largo HS, Inv 20908	ASBESTOS SPECIALISTS INC	20908	213,600.00	14-Oct-15	14-Oct-15
15-Oct	FY16 Asbestos - ASI Add money to PO 608018 - Ardmore ES PCO#1	ASBESTOS SPECIALISTS INC	20944	2,450.00	1-Oct-15	1-Oct-15
15-Oct	FY16 Asbestos - ASI Add money to PO 608018 - Ardmore ES PCO#2	ASBESTOS SPECIALISTS INC	20944	2,513.00	1-Oct-15	1-Oct-15
15-Oct	FY16 ARRT - ASI - Ardmore ES - Classrooms K-2, 32, MP Room Stage	ASBESTOS SPECIALISTS INC	20944	19,950.00	1-Oct-15	1-Oct-15
15-Oct	FY16 Asbestos-ASI-James Harrison ES	ASBESTOS SPECIALISTS INC	20946	12,200.00	1-Oct-15	1-Oct-15
15-Sep	FY16 Asbestos - ASI - Dodge Park-PCO#1 additional work	ASBESTOS SPECIALISTS INC	20907	5,580.00	29-Sep-15	29-Sep-15
15-Sep	FY16 Asbestos - ASI - Dodge Park-Base Work	ASBESTOS SPECIALISTS INC	20907	25,750.00	29-Sep-15	29-Sep-15
15-Sep	FY16 Asbestos - ASI Greenbelt ES	ASBESTOS SPECIALISTS INC	20906	97,700.00	29-Sep-15	29-Sep-15
15-Sep	FY16 Asbestos - ASI - DuVal HS Classroom 128 & 60	ASBESTOS SPECIALISTS INC	20885	6,850.00	30-Sep-15	30-Sep-15
15-Sep	FY16 Asbestos - ASI Gaywood ES Flash Patch Floors	ASBESTOS SPECIALISTS INC	20945	53,012.00	30-Sep-15	30-Sep-15
15-Sep	FY16 ARRT - Apple Grove ES-Miscellaneous Classroom Asbestos Abatement	ASBESTOS SPECIALISTS INC	20909	11,200.00	3-Sep-15	3-Sep-15
				631,100.00		
15-Jan	(FY15 AR) IFB 112-14 exp 7/31/17: Bowie HS, Asbestos Abatement, Room 250, Proposal Dated 9/15/14	BARCO ENTERPRISES INC	96-14B096//	6,600.00	13-Jan-15	13-Jan-15
				6,600.00		
16-Mar	(FY15 MS) IFB 112-14 exp. 7/31/17: Woodmore ES, Asbestos Abatement in Room 9 Proposal Dated 9/26/14	BRISTOL ENVIRONMENTAL INC	1506085-IN	15,350.00	4-Mar-16	4-Mar-16
16-Mar	(FY15 MS) IFB 112-14 exp. 7/31/17: Woodmore ES, Asbestos Abatement in Main Hallway, Proposal Dated 9/26/14	BRISTOL ENVIRONMENTAL INC	1506085-IN	19,750.00	4-Mar-16	4-Mar-16

14-Sep	(FY15 MS) IFB 112-14 exp. 7/31/17: Kenmoor MS, Emergency Response for Asbestos Abatement, Invoice 1409003-IN	BRISTOL ENVIRONMENTAL INC	1409003-IN	2,748.02	30-Sep-14	30-Sep-14
16-Feb	(FY16) Environmental - Floor tile and mastic abatement, ROTC Offices room 130 & 131 @ Surrattsville HS	BRISTOL ENVIRONMENTAL INC	1512051-IN	4,850.00	4-Feb-16	4-Feb-16
16-Feb	(FY16) Environmental - Asbestos abatement & mold remediation @ Baden ES - Health Clinic; Change order to increase funds on PO 615349	BRISTOL ENVIRONMENTAL INC	1512100-IN	9,511.96	4-Feb-16	4-Feb-16
16-Feb	(FY16) Environmental - Ceiling tile and spray-on insulation abatement in classroom 126 @ Bowie HS	BRISTOL ENVIRONMENTAL INC	1512103-IN	9,750.00	4-Feb-16	4-Feb-16
16-Feb	FY16 Asbestos - Bristol Environmental-Tall Oaks HS	BRISTOL ENVIRONMENTAL INC	1508018-IN	16,187.00	4-Feb-16	4-Feb-16
16-Feb	(FY16) Environmental - Asbestos abatement & mold remediation @ Baden ES - Health Clinic	BRISTOL ENVIRONMENTAL INC	1512100-IN	28,250.00	4-Feb-16	4-Feb-16
16-Feb	(FY16) FAB building - office area - asbestos abatement, Invoice 1506105-IN	BRISTOL ENVIRONMENTAL INC	1506105-IN	7,975.00	17-Feb-16	17-Feb-16
16-Mar	(FY16) Floor tile and mastic abatement and mold remediation @ Surrattsville HS, ROTC Offices Rooms 130 & 131	BRISTOL ENVIRONMENTAL INC	1512052-IN	7,445.00	4-Mar-16	4-Mar-16
				119,068.96		
14-Aug	(FY15 MR) Rider Contract for JMI-616-14 6/30/19: Laurel ES - Asbestos Abatement, Proposal Dated 6/3/14	COLT INSULATION INC	2.529E+11	13,780.00	13-Aug-14	13-Aug-14
14-Aug	RFP 112-14 Bladensburg HS - Mold Remediation, Proposal Dated 7/28/14	COLT INSULATION INC	2.747E+11	4,480.00	21-Aug-14	21-Aug-14
15-Aug	(FY15 AR) Colt Insulation, Seabrook ES, hallway outside boiler room, floor tile & mastic abatement to be completed during spring break.	COLT INSULATION INC	2.747E+11	4,988.00	19-Aug-15	19-Aug-15
15-Jan	(FY15 MR) IFB 112-14 exp 7/31/17: Montpelier ES, Asbestos Abatement, Room 309, Proposal Dated 11/25/14	COLT INSULATION INC	2.747E+11	9,985.00	5-Jan-15	5-Jan-15
15-Mar	(FY15 AR) SAMUEL OGLE - Colt Insulation, emergency asbestos abatement due to pipe burst, CR 106.	COLT INSULATION INC	2.747E+11	4,955.00	16-Mar-15	16-Mar-15
15-Mar	(FY15 AR) SAMUEL OGLE - Colt Insulation, emergency asbestos abatement due to pipe burst, CR 108 & 110.	COLT INSULATION INC	2.747E+11	32,980.00	16-Mar-15	16-Mar-15
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/14: Thomas Claggett ES, Asbestos Abatement, Proposal Dated 9/12/14	COLT INSULATION INC	2.747E+11	4,980.00	30-Sep-14	30-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/14: Hyattsville MS, Asbestos Abatement of Rooms 103, 109, 110 & Basement, Proposal Dated 8/21/14	COLT INSULATION INC	2.747E+11	3,980.00	15-Sep-14	15-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/14: H. Winship Wheatley SC, Asbestos Removal in Rooms F162, F158, B113 & Hallway, A103 & Hallway, Proposal Dated 9/5/14	COLT INSULATION INC	2.747E+11	8,780.00	15-Sep-14	15-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/14: Removal of Two Asbestos Chalkboards, Proposal Dated 8/19/14	COLT INSULATION INC	2.747E+10	2,480.00	11-Sep-14	11-Sep-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/17: Thomas Claggett ES - Removal of Asbestos Piping Insulation, Proposal 8/14/14	COLT INSULATION INC	2.747E+11	4,785.00	4-Sep-14	4-Sep-14
14-Sep	(FY15 MR) Rider Contract for JMI-616-14 6/30/19: Thomas Claggett ES - Asbestos Abatement of Hallway Outside of Cafeteria, Proposal Dated 8/6/14	COLT INSULATION INC	2.747E+11	5,600.00	4-Sep-14	4-Sep-14
14-Sep	(FY15 MR) Rider Contract for JMI-616-14 6/30/19: James McHenry ES - Asbestos Abatement, Proposal Dated 7/30/14	COLT INSULATION INC	2.747E+11	7,880.00	4-Sep-14	4-Sep-14
16-Feb	(FY16) Environmental - Thermal insulation abatement @ Dwight Eisenhower	COLT INSULATION INC	2.747E+10	5,980.00	24-Feb-16	24-Feb-16
16-Feb	(FY16) Environmental - Mold abatement @ Largo HS, Wash Can Room	COLT INSULATION INC	2.747E+11	4,980.00	2-Feb-16	2-Feb-16
16-Jan	(FY16) Environmental - Abate floor tile and mastic @ Judy Hoyer Office 117	COLT INSULATION INC	2.747E+11	3,480.00	14-Jan-16	14-Jan-16
16-Jan	(FY16) Environmental - Floor tile & Mastic abatement @ Calverton ES	COLT INSULATION INC	2.747E+11	7,980.00	14-Jan-16	14-Jan-16
16-Jan	(FY16) Environmental - Emergency request; Dead Pigeons & Waste remediation, Rooftop HVAC Units & CR 1109	COLT INSULATION INC	2.747E+11	14,980.00	14-Jan-16	14-Jan-16
16-Jan	(FY16) Environmental - Floor Tile & Mastic abatement @ Judy Hoyer Family Learning Center - Office 117	COLT INSULATION INC	2.747E+11	3,480.00	6-Jan-16	6-Jan-16
15-Oct	FY16 Colt-Dodge Park ES Mold Remediation of piping, room 27	COLT INSULATION INC	2.747E+11	4,977.00	5-Oct-15	5-Oct-15
15-Oct	FY16 Asbestos Colt-Margaret Brent School-Reinsulation of Pipe rms 2,3,10&13	COLT INSULATION INC	2.747E+11	3,400.00	9-Oct-15	9-Oct-15
15-Sep	FY16 Environmental - Change Order for PO 606582	COLT INSULATION INC	2.747E+11	3,782.00	9-Sep-15	9-Sep-15
				95,962.00		
14-Aug	(FY15 AR) Rider Contract for BCS-13071 11/13/16: Beacon Heights ES - Asbestos Abatement, Proposal dated 7/16/14	RETRO ENVIRONMENTAL INC	2014-7418	2,300.00	25-Aug-14	26-Aug-14
14-Aug	(FY15 AR) Rider Contract for BCS-13071 11/13/16: High Point ES - Asbestos Abatement, Proposal Dated 7/9/14	RETRO ENVIRONMENTAL INC	2014-7415	2,775.00	25-Aug-14	26-Aug-14

14-Aug	(FY15 AR) BCS-13071 11/13/16: Chillum ES - Asbestos Abatement, Proposal Submitted 5/13/14	RETRO ENVIRONMENTAL INC	2014-7379	2,835.00	6-Aug-14	6-Aug-14
14-Aug	(FY15 AR) Rider Contract for BCS-13071 11/13/16: Montpelier ES - Asbestos Abatement, Retro 2014-0571	RETRO ENVIRONMENTAL INC	2014-7381	4,100.00	6-Aug-14	6-Aug-14
14-Aug	(FY15 AR) Rider Contract for BCS-13071 11/13/16: Bond Mill ES - Asbestos Abatement in MP Room, Proposal Dated 5/13/14	RETRO ENVIRONMENTAL INC	2014-7376	6,150.00	6-Aug-14	6-Aug-14
14-Aug	(FY15 AR) BCS-13071 11/13/16: DD Eisenhower - Asbestos Abatement in MP Room, Proposal Submitted 4/28/14	RETRO ENVIRONMENTAL INC	2014-7375	10,400.00	6-Aug-14	6-Aug-14
14-Aug	(FY15 AR) BCS-13071 11/13/16: Patuxent ES - Asbestos Abatement, Proposal Dated 4/22/14	RETRO ENVIRONMENTAL INC	2014-7295	3,400.00	14-Aug-14	14-Aug-14
14-Aug	(FY15 AR) BCS-13071 11/13/16: Cesar Chavez ES - Asbestos Abatement, Proposal Submitted 5/16/14	RETRO ENVIRONMENTAL INC	2014-7335	3,780.00	14-Aug-14	14-Aug-14
14-Aug	(FY15 AR) Rider Contract for BCS-13071 11/13/16: Ridgecrest ES - Asbestos Abatement in Kitchen, Invoice 2014-7332	RETRO ENVIRONMENTAL INC	2014-7332	3,150.00	18-Aug-14	18-Aug-14
15-May	FY15 AR) Retro, Isaac Gourdine, Asbestos Abatement, Retro 2015-0062	RETRO ENVIRONMENTAL INC	2015-7886	2,550.00	4-May-15	4-May-15
15-May	(FY15 AR) Thurgood Marshall MS, CR 219, Asbestos Abatement, Retro 2015-0061.	RETRO ENVIRONMENTAL INC	2015-7880	3,400.00	4-May-15	4-May-15
14-Nov	(FY15 AR) IFB 112-14 exp 7/31/17: Eleanor Roosevelt HS - Emergency Mold Remediation, CO#1, Proposal Dated 9/15/14	RETRO ENVIRONMENTAL INC	2014-7548	8,920.00	10-Nov-14	10-Nov-14
14-Nov	(FY15 AR) Eleanor Roosevelt HS, various classrooms, mold remediation, per proposal Retro# 2014-0715	RETRO ENVIRONMENTAL INC	2014-7548	17,400.00	10-Nov-14	10-Nov-14
14-Sep	(FY15 AR) IFB 112-14 exp 7/31/17: Eleanor Roosevelt HS - Asbestos Abatement, Partial Lower Level, Proposal 2014-0703	RETRO ENVIRONMENTAL INC	2014-7481	5,100.00	30-Sep-14	30-Sep-14
14-Sep	(FY15 MS) IFB 112-14 exp 7/31: Eleanor Roosevelt HS - Mold Remediation Room 222A, Proposal- 2014-0704	RETRO ENVIRONMENTAL INC	2014-7477	3,900.00	16-Sep-14	16-Sep-14
15-Aug	FT16 ARRT ERHS Lower Level Corridor Pipe Insulation Removal & Replacement/Mall#1 & #2 High Ceiling Tile Removal & Replacement Retro#2015-0265	RETRO ENVIRONMENTAL INC	2015-8123	17,245.00	25-Aug-15	25-Aug-15
15-Dec	FY16 Asbestos - Retro - Drew Freeman Job#15-0574 Change Order #1 for 13000.00 add to PO#606797	RETRO ENVIRONMENTAL INC	2015-8147	12,200.00	10-Dec-15	10-Dec-15
15-Dec	FY16 Environmental - Retro - Drew Freeman- Removal of water damaged/contaminated chilled water pipe insulation and replacement/Retro#2015-0574	RETRO ENVIRONMENTAL INC	2015-8147	18,800.00	10-Dec-15	10-Dec-15
16-Feb	(FY16) Environmental - Floor tile Installation @ Oakland ES, Kitchen area	RETRO ENVIRONMENTAL INC	2015-8532	4,950.00	19-Feb-16	19-Feb-16
16-Feb	(FY16) Environmental - Floor tile and mastic abatement, kitchen area @ Oakland ES	RETRO ENVIRONMENTAL INC	2015-8533	6,880.00	19-Feb-16	19-Feb-16
16-Jan	FY16 Asbestos Abatement - IFB112-14 exp 7-31-17 Retro various schools - University Park ES	RETRO ENVIRONMENTAL INC	2015-8446	5,790.00	8-Jan-16	8-Jan-16
15-Sep	FY16 Asbestos - Retro - Shugart MS - RFP 112-14	RETRO ENVIRONMENTAL INC	2015-8125	12,425.00	10-Sep-15	10-Sep-15
15-Sep	FY16 Asbestos-Retro-Capital Heights ES	RETRO ENVIRONMENTAL INC	2015-8148	21,840.00	10-Sep-15	10-Sep-15
15-Sep	FY16 Asbestos Abatement - IFB112-14 exp 7-31-17 Retro various schools-Bowie HS	RETRO ENVIRONMENTAL INC	2015-8067	37,320.00	17-Sep-15	17-Sep-15
15-Sep	FY16 Asbestos Abatement - IFB112-14 exp 7-31-17 Retro various schools-Beltsville Academy	RETRO ENVIRONMENTAL INC	2015-8090	25,205.00	17-Sep-15	17-Sep-15
15-Sep	FY16 Asbestos Abatement - IFB112-14 exp 7-31-17 Retro various schools-Morningside ES	RETRO ENVIRONMENTAL INC	2015-8124	25,900.00	17-Sep-15	17-Sep-15
15-Sep	FY16 Asbestos Abatement - IFB112-14 exp 7-31-17 Retro various schools-Challenger Campus	RETRO ENVIRONMENTAL INC	2015-8109	14,700.00	17-Sep-15	17-Sep-15
15-Sep	FY16 Asbestos Abatement - IFB112-14 exp 7-31-17 Retro various schools-Thurgood Marshall MS	RETRO ENVIRONMENTAL INC	2015-8098	15,400.00	17-Sep-15	17-Sep-15
15-Sep	FY16 Asbestos Abatement - IFB112-14 exp 7-31-17 Retro various schools-Princeton ES	RETRO ENVIRONMENTAL INC	2015-8108	1,500.00	17-Sep-15	17-Sep-15
15-Sep	FY16 Asbestos - RETRO - Drew Freeman #2015-0419 Remove & Dispose of 1096 ST water damaged/stained ceiling tile	RETRO ENVIRONMENTAL INC	2015-8012	4,335.00	22-Sep-15	22-Sep-15
				230,440.00		
15-Jan	(FY 15 MR) Samuel Chase Asbestos tile abatement Main Office, Nurse's Office & 2 supply closets. Additional abatement Principal's Office per proposal submitted 10/3/14.	SanDow Construction, Inc.	1606	3,900.00	7-Jan-15	7-Jan-15
14-Oct	(FY15 AR) IFB 112-14 exp 7/31/17: Hyattsville MS Asbestos Abatement, Proposal Dated 7/31/14	SanDow Construction, Inc.	1582	3,455.00	6-Oct-14	6-Oct-14
16-Jan	(FY16) Environmental - floor tile and mastic abatement @ Highbridge ES, classroom 20	SanDow Construction, Inc.	1746	7,420.00	20-Jan-16	20-Jan-16
15-Oct	(FY16) Sandow Construction; Emergency Abatement Project @ Francis Fuchs ES carpet & acm tile	SanDow Construction, Inc.	1714	7,486.00	13-Oct-15	13-Oct-15
15-Sep	FY16 - Sandow Constructions - Nicholas Orems MS	SanDow Construction, Inc.	1672	3,875.00	22-Sep-15	22-Sep-15

				18,781.00		
--	--	--	--	-----------	--	--

From: [Karen Bowlding](#)
To: [Convery, Christine](#)
Subject: Re: Date of Ardmore Management Plan?
Date: Friday, April 08, 2016 8:19:25 AM

Hi Christine,

6/21/1988 was the original inspection date.

Karen

On Thu, Apr 7, 2016 at 4:17 PM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Karen,

Can you confirm the date of the asbestos management plan for Ardmore? I have 1988 – is there a more specific date on the plan? I need to include this fact in the Consent Agreement and Final Order.

Thanks,

Christine

Christine Convery

Compliance and Enforcement Officer | FIFRA Section 7 Coordinator

Pesticides and Asbestos Programs Branch | EPA Region 3

1650 Arch Street | Philadelphia, PA 19103

Phone: [215-814-2249](tel:215-814-2249)

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Mrs. Karen Bowlding, Acting Environmental Program Specialist

Prince Georges County Public Schools | Division of Supporting Services | Environmental Office

karen.bowlding@pgcps.org | Office: 301.952.6760 or Ext. 38434 | Cell: 240.464.2219

From: [Convery, Christine](#)
To: [Karen Bowlding](#)
Subject: RE: Notice of Non-Compliance
Date: Monday, February 22, 2016 2:29:00 PM

Good afternoon Karen,

Are you able to meet with me via phone to discuss your response to the Show Cause (Ardmore Elementary)? I am open most of the week of March 7th, do you have any available times that week – maybe set aside 1 hour, but it will probably take less time.

Thanks,
Christine

Christine Convery
Compliance and Enforcement Officer | FIFRA Section 7 Coordinator
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: 215-814-2249

From: Karen Bowlding [mailto:karen.bowlding@pgcps.org]
Sent: Monday, January 11, 2016 12:11 PM
To: Convery, Christine <Convery.Christine@epa.gov>
Subject: Re: Notice of Non-Compliance

See attached documents...

Please let me know if I need to send you anything else or if the attached information settles the issue.

Karen

On Mon, Jan 11, 2016 at 11:32 AM, Convery, Christine <Convery.Christine@epa.gov> wrote:

I did not receive it. Do you know if it was mailed USPS, FedEx?

From: Karen Bowlding [mailto:karen.bowlding@pgcps.org]
Sent: Monday, January 11, 2016 11:25 AM
To: Convery, Christine <Convery.Christine@epa.gov>
Subject: Re: Notice of Non-Compliance

It was mailed out before the break...

On Mon, Jan 11, 2016 at 11:19 AM, Convery, Christine <Convery.Christine@epa.gov>

wrote:

Karen,
Checking in on the status of your response.
Thanks,
Christine

From: Karen Bowlding [mailto:karen.bowlding@pgcps.org]

Sent: Tuesday, December 01, 2015 9:22 AM

To: Convery, Christine <Convery.Christine@epa.gov>

Subject: Re: Notice of Non-Compliance

Christine,

We will respond to this before the winter break...working on it now.

Karen

On Tue, Nov 17, 2015 at 4:45 PM, Convery, Christine <Convery.Christine@epa.gov> wrote:

Ms. Bowlding,

As a courtesy, I'm providing to you an advance copy of a Notice of Non-Compliance and Request to Show Cause letter ("Show Cause") for Ardmore Elementary School (see attached). This letter was sent via certified mail today to Dr. Maxwell and Ms. Garlington Battle, Esq; I anticipate they will receive it Wednesday or Thursday. The letter alleges 3 violations of TSCA-AHERA (asbestos in schools regulations) found as a result of the Maryland Department of Environment (MDE) inspection back in January 2015. As you may or may not be aware, this inspection was performed as a result of more than one tip/complaint to MDE and EPA regarding Ardmore Elementary School's asbestos management.

The violations alleged in the Show Cause are as follows:

- 1) Failure to perform an inspection

The MDE inspection showed that no documentation (i.e., an architect letter) was available demonstrating that the 1999 addition or the modular classroom were excluded from asbestos inspection requirements. If you have a letter or documentation for either or both of these areas, please provide it in your response to the Show Cause.

- 2) Failure to perform reinspection

Although Mr. Dallas provided, to me, a signature page with date stating that a 3-yr inspection had been performed, he was not able to provide inspection records for the most recent 3-year reinspection. Mr. Dallas explained PGCPs uses "periodic

surveillance” in lieu of 3 year reinspections. I understand this is the practice throughout the school district and this practice is not compliant with TSCA-AHERA. I explained to Mr. Dallas via email and verbally on the phone (around April 2015) that for 3 year reinspections an accredited inspector must visually reinspect and reassess the condition of all known or assumed friable asbestos containing building materials (ACBM), visually inspect previously considered nonfriable ACBM and touch it to determine if it has become friable, identify homogeneous areas of material that have become friable since the last inspection developed required records and submit the records to you (the AHERA Designated Person) within 30 days of reinspection. Further, the records of the inspection must include:

- The date of the reinspection, the name and signature of the person making the reinspection, and accreditation documentation;
- Any changes in the condition of known or assumed asbestos containing building materials;
- Exact location where samples were collected during the reinspection, a description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, and accreditation documentation;
- Any assessments or reassessments made of friable material, the name and signature of the accredited inspector and accreditation documentation; and
- Written recommendations of the management planner.

In the event a 3 year reinspection coincides with a planned 6-month surveillance, you can substitute the 3-year reinspection for a 6-month surveillance, but not the other way around (i.e., 6-month surveillance cannot take the place of a 3-year reinspection, since reinspections are more comprehensive than a 6-month surveillance).

If you would like to see an example of a typical 3-year reinspection report, I will see what I can find for you.

3) Failure to obtain bulk samples

The MDE inspection showed that the following materials in Ardmore Elementary School were not sampled (or assumed to be asbestos in the management plan): 3” black, brown, beige and 4” navy blue vinyl based cove moldings-mastics, veneer and cores of folding partition walls 30-2 and 24-26, stainless sink undercoatings, rope and woven gaskets on two Hurst boilers, navy stage curtain in multi-purpose room.

Feel free to call me to discuss or if you prefer to respond formally through a letter, that’s fine too.

Sincerely,

Christine Convery
Compliance and Enforcement Officer | FIFRA Section 7 Coordinator
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: [215-814-2249](tel:215-814-2249)

--

Mrs. Karen Bowlding, Acting Environmental Program Specialist

Prince Georges County Public Schools | Division of Supporting Services | Environmental Office

karen.bowlding@pgcps.org | Office: [301.952.0831](tel:301.952.0831) or Ext. 38434 | Cell: [240.464.2219](tel:240.464.2219)

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Mrs. Karen Bowlding, Acting Environmental Program Specialist

Prince Georges County Public Schools | Division of Supporting Services | Environmental Office

karen.bowlding@pgcps.org | Office: [301.952.6760](tel:301.952.6760) or Ext. 38434 | Cell: [240.464.2219](tel:240.464.2219)



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Mrs. Karen Bowlding, Acting Environmental Program Specialist

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karen.bowlding@pgcps.org | Office: 301.952.6760 or Ext. 38434 | Cell: 240.464.2219



From: [Lee, Matthew T.](#)
To: [Convery, Christine](#)
Subject: RE: EJ Screen for Ardmore Elementary School
Date: Wednesday, August 24, 2016 7:49:34 AM
Attachments: [Ardmore Elementary School at 9301 Arwick-Ardmore Road, Springdale, MD 20774_ejscreen_report.pdf](#)

Hi Christine,

Please find the requested info below and attached. Let me know if you have any questions.

Ardmore Elementary School
9301 Arwick-Ardmore Road
Springdale, MD 20774

Lat: 38.934165

Long: -76.846655

EJSCREEN Results:

EJSCREEN provides information on eleven different EJ Indexes. Each EJ Index combines one environmental measure with demographic data to characterize potential areas of EJ concern that may warrant further consideration, analysis or outreach.

According to the EJSCREEN Common User Guidelines, a site will be considered a good candidate for additional review when an EJSCREEN analysis for that area shows one or more of the eleven Primary EJ Indexes is at or above the 80th percentile in the **nation**. Region III's protocol when conducting an additional screening review is that if the site is **also** located in an area where one or more of the eleven Primary EJ Indexes is at or above the 80th percentile for the **state**, that site is considered to be in an area of potential EJ concern. An area may also warrant additional review if other readily available information suggests the potential for EJ concerns. For this assessment information was considered on the block group which contains the site as well as using a one mile radius around the site.

When considering the block group which contains the **Ardmore Elementary School at 9301 Arwick-Ardmore Road, Springdale, MD 20774** and a one mile radius around the facility, one or more of the eleven Primary EJ Indexes is at or above the 80th percentile in the **nation and state**. The area around the facility also exceeds the state average for the percentage of low-income populations and for minority populations and therefore **is considered to be in an area of potential EJ concern according to Region III's protocol**. The EJSCREEN results are attached.

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be

supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

This version of EJSCREEN is available to the public and the attachment may be shared. Do not release Region III's protocols associated with EJSCREEN.

For Inclusion in Case Conclusion Data Sheets/ICIS:

EJSCREEN Flag National: ☐ **X** ☐ Yes ☐ No

EJSCREEN Flag State: ☐ **X** ☐ Yes ☐ No

Enhanced Review for Potential EJ Concerns:

- ☒ Enhanced Review – Potential EJ Concern Found
- ☐ Enhanced Review – Potential EJ Concern Not Found
- ☐ No Enhanced Review

Basis of EJ Determination (Select all that apply):

- ☐ Community Self-Identification
- ☒ EJSCREEN data
- ☐ EPA knowledge of community/location (including inspector observation)
- ☐ Other basis (Please Explain)
- ☐ Other Federal Government knowledge of community/location
- ☐ Public Input
- ☐ State/Local/Tribal Government knowledge of community/location

Explanation of Basis:

For this assessment information was considered on the block group which contains the facility as well as a one mile radius around the facility. When considering the block group which contains the facility and a one mile radius around the facility, one or more of the eleven Primary EJ Indexes is at or above the 80th percentile in the nation and state. The area around the facility also exceeds the state average for the percentage of low-income populations and for minority populations.

Matthew T. Lee
Environmental Protection Specialist
Office of Enforcement, Compliance and Environmental Justice
U.S. EPA Region III
1650 Arch Street (3EC00)
Philadelphia, PA 19103
(215) 814-2917
Lee.Matthew@epa.gov

From: Convery, Christine

Sent: Tuesday, August 23, 2016 11:58 AM

To: Lee, Matthew T. <lee.matthew@epa.gov>

Subject: EJ Screen for Ardmore Elementary School

Matthew,

I'd like to request an EJ screen for the following facility:

Facility address:

Ardmore Elementary School
9301 Arwick-Ardmore Road
Springdale, MD 20774

Lat: 38.934165

Long: -76.846655

Thanks,
Christine

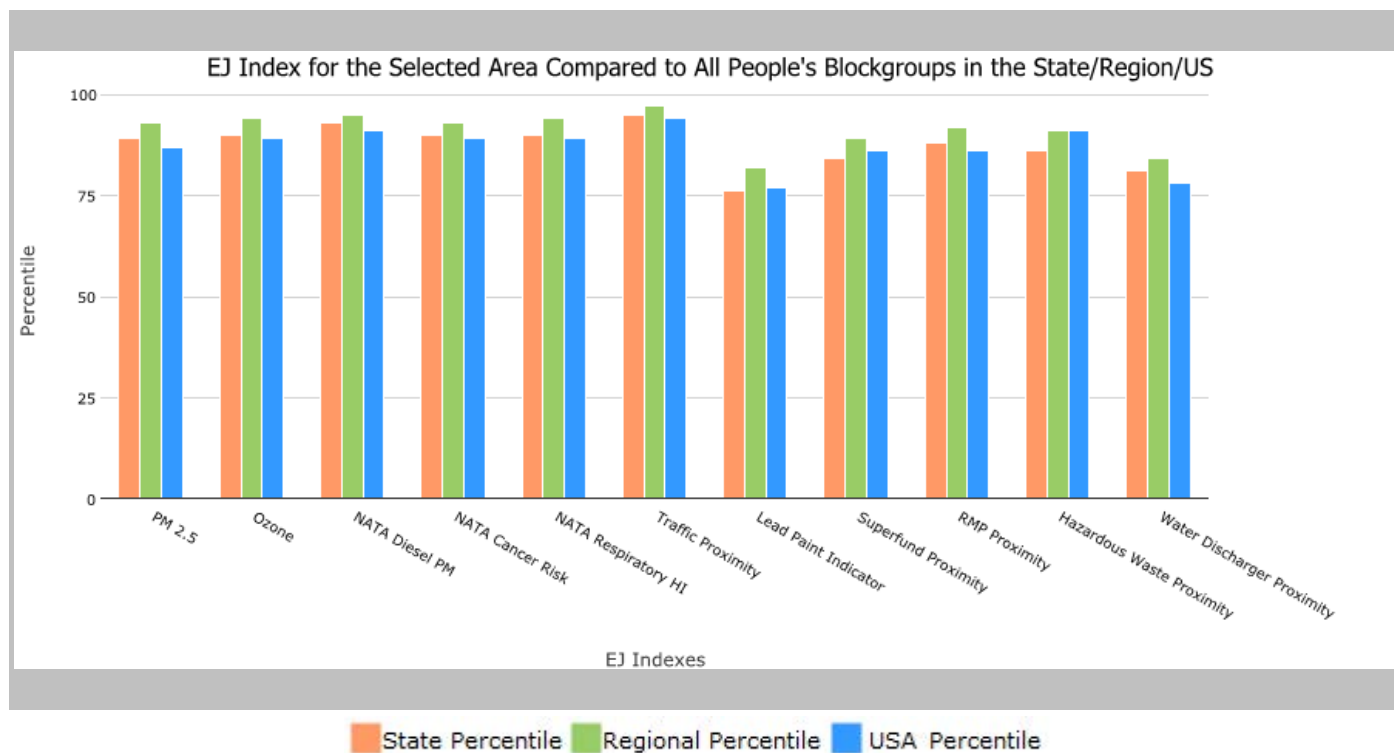
Christine Convery
Pesticides and Asbestos Programs Branch | EPA Region 3
1650 Arch Street | Philadelphia, PA 19103
Phone: 215-814-2249

1 mile Ring Centered at 38.934165,-76.846655, MARYLAND, EPA Region 3

Approximate Population: 10,246

Input Area (sq. miles): 3.14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	89	93	87
EJ Index for Ozone	90	94	89
EJ Index for NATA* Diesel PM	93	95	91
EJ Index for NATA* Air Toxics Cancer Risk	90	93	89
EJ Index for NATA* Respiratory Hazard Index	90	94	89
EJ Index for Traffic Proximity and Volume	95	97	94
EJ Index for Lead Paint Indicator	76	82	77
EJ Index for Superfund Proximity	84	89	86
EJ Index for RMP Proximity	88	92	86
EJ Index for Hazardous Waste Proximity	86	91	91
EJ Index for Water Discharger Proximity	81	84	78

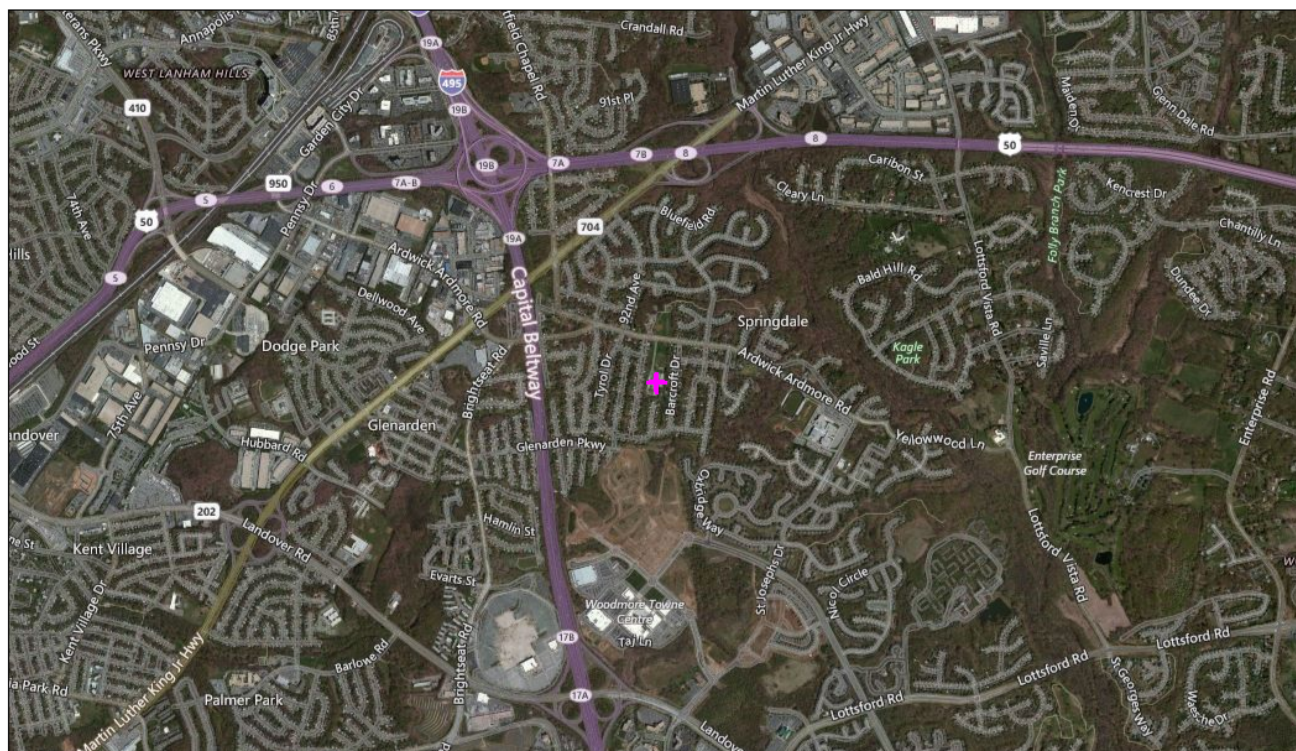


This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 38.934165,-76.846655, MARYLAND, EPA Region 3

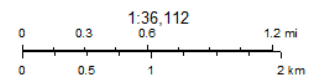
Approximate Population: 10,246

Input Area (sq. miles): 3.14



August 23, 2016

- + Digitized Point
- EJ Grants
- CARE Grants



OEI, OCFO, OEJ and OSWER
Image courtesy of USGS Earthstar Geographics SIO © 2016 Microsoft
Corporation © 2010 NAVTEQ © AND

Sites reporting to EPA

Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0
National Pollutant Discharge Elimination System (NPDES)	0

EJSCREEN Report (Version 2016)

1 mile Ring Centered at 38.934165,-76.846655, MARYLAND, EPA Region 3

Approximate Population: 10,246

Input Area (sq. miles): 3.14

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.68	9.86	26	9.84	40	9.32	54
Ozone (ppb)	53	52.4	83	49.8	96	47.4	80
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	1.61	1.1	87	0.918	80-90th	0.937	80-90th
NATA* Cancer Risk (lifetime risk per million)	51	45	72	42	70-80th	40	80-90th
NATA* Respiratory Hazard Index	2.5	2	76	1.8	80-90th	1.8	80-90th
Traffic Proximity and Volume (daily traffic count/distance to road)	1900	580	92	350	95	590	93
Lead Paint Indicator (% Pre-1960 Housing)	0.1	0.3	37	0.37	25	0.3	37
Superfund Proximity (site count/km distance)	0.09	0.13	54	0.15	54	0.13	63
RMP Proximity (facility count/km distance)	0.36	0.38	77	0.35	74	0.43	70
Hazardous Waste Proximity (facility count/km distance)	0.11	0.14	66	0.11	71	0.072	83
Water Discharger Proximity (facility count/km distance)	0.099	0.22	34	0.37	24	0.31	30
Demographic Indicators							
Demographic Index	57%	35%	82	30%	87	36%	79
Minority Population	97%	46%	91	31%	96	37%	95
Low Income Population	19%	23%	48	29%	35	35%	27
Linguistically Isolated Population	0%	3%	47	2%	55	5%	45
Population With Less Than High School Education	8%	11%	47	12%	42	14%	39
Population Under 5 years of age	6%	6%	51	6%	56	6%	50
Population over 64 years of age	16%	13%	70	15%	61	14%	67

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

From: [Wesley Watts](#)
To: [Convery, Christine](#)
Subject: Fwd: Ardmore AHERA case - Docket #TSCA-03-2016-0119
Date: Tuesday, September 06, 2016 3:07:46 PM
Attachments: [Ardmore - Final CAFO.pdf](#)
[Ardmore- CAFO signed by Maxwell.pdf](#)

Mrs. Convery,

PGCPS consents to the following:

- 1) That you consent to me adding the date 8/11/16 to Dr. Maxwell's signature line.
- 2) That you consent to the addition of a header the CAFO (see "Final CAFO").
- 3) That you consent to the additional language in the Final Order (see "Final CAFO").

If you consent to all three of the above items, I will use Dr. Maxwell's signature page (no need for him to resign) and forward this CAFO to my management and finally to the Regional Judicial Officer. Once the CAFO is signed and filed, I will provide you a final copy – per our normal protocol and Dr. Maxwell's request.

Thank you,

Wesley

W. Wesley Watts Jr., Ed. D
Chief Operating Officer
Prince George's County Public Schools
Sasscer Administration Building
14201 School Lane
Upper Marlboro, MD 20772
301-952-6011 (W)

*Learner * Achiever * Belief * Futuristic * Responsibility*

----- Forwarded message -----

From: **Convery, Christine** <Convery.Christine@epa.gov>
Date: Wed, Aug 24, 2016 at 11:27 AM
Subject: Ardmore AHERA case - Docket #TSCA-03-2016-0119
To: "wesley.watts@pgcps.org" <wesley.watts@pgcps.org>

Dr. Watts,

I received the subject Consent Agreement and Final Order (CAFO) signed by Dr. Maxwell. Unfortunately, he did not provide a date. The memo included in the package was dated 8/11/16. Do you consent to me adding this date to Dr. Maxwell's signature line?

Additionally, some changes to the documents are necessary in order for the CAFO to be acceptable to the Regional Judicial Officer. These changes are as follows:

- 1) Adding a header with the case name and docket number to the CAFO.
- 2) Adding additional text to the Final Order (last 2 pages).

I also noted there was a typo in the address for your school district ("Land" instead of "Lane"), so I have corrected that.

To this email I have attached the original CAFO (the one signed by Dr. Maxwell) as well as the updated/final CAFO, for your comparison.

Please respond to this email indicating:

- 1) That you consent to me adding the date 8/11/16 to Dr. Maxwell's signature line.
- 2) That you consent to the addition of a header the CAFO (see "Final CAFO").
- 3) That you consent to the additional language in the Final Order (see "Final CAFO").

If you consent to all three of the above items, I will use Dr. Maxwell's signature page (no need for him to resign) and forward this CAFO to my management and finally to the Regional Judicial Officer. Once the CAFO is signed and filed, I will provide you a final copy – per our normal protocol and Dr. Maxwell's request.

Sincerely,

Christine

Christine Convery

Compliance and Enforcement Officer | FIFRA Section 7 Coordinator

Pesticides and Asbestos Programs Branch | EPA Region 3

1650 Arch Street | Philadelphia, PA 19103

Phone: [215-814-2249](tel:215-814-2249)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

In Reply Refer To Mail Code: 3LC62

SEP 20 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Wesley Watts
Chief Operating Officer
Prince George's County School District
14201 School Lane
Upper Marlboro, MD 20772

Re: Consent Agreement and Final Order
EPA Docket No.: TSCA-03-2016-0119

Dear Dr. Watts:

Enclosed is a copy of the CONSENT AGREEMENT AND FINAL ORDER filed today with the Regional Hearing Clerk settling the matter referenced above. For your files, I am also enclosing a copy of the supporting memorandum from Environmental Protection Agency management to the Regional Judicial Officer. Should you have any questions or concerns, please feel free to contact me at (215) 814-2249.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine E. Convery".

Christine E. Convery
Pesticides/Asbestos Enforcement Officer

Enclosures

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

In The Matter of:

Prince George's County School District
14201 School Lane
Upper Marlboro, MD 20772

Respondent

:
:
:
:
:
:
:
:

Docket No: TSCA-03-2016-0119

CONSENT AGREEMENT

REGIONAL HEARING OFFICE
EPA REGION III, PHILA. PA

2016 SEP 20 PM 4:59

RECEIVED

CONSENT AGREEMENTI. Preliminary Statement

This Consent Agreement ("CA"), issued under the authority set forth in Sections 16 and 207 of TSCA, 15 U.S.C. §§ 2615 and 2647, is entered into, through delegation, by the Director, Land and Chemicals Division, U.S. Environmental Protection Agency – Region III ("EPA" or "Complainant") and the Prince George's County School District ("Respondent"). This CA includes the assessment of a civil penalty against Respondent because it is a local education agency liable for violations which occurred at Ardmore Elementary School (the "Facility"), pursuant to the Toxic Substances Control Act ("TSCA") Subchapter II (the Asbestos Hazard Emergency Response Act or "AHERA"), 15 U.S.C. §§ 2641 to 2656; and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22, with specific reference to the provisions set forth at 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3).

This Consent Agreement and the accompanying Final Order (collectively referred to herein as the "CAFO") address violations by Respondent of TSCA AHERA and the federal regulations implementing AHERA as set forth at 40 C.F.R. Part 763 Subpart E, and resolve Complainant's civil claims against Respondent arising from the violations alleged herein.

II. General Provisions

1. For the purpose of this proceeding only, Respondent admits the jurisdictional allegations set forth in this CAFO.
2. Except as provided in paragraph 1, above, Respondent neither admits nor denies the specific factual allegations and conclusions of law set forth in this CAFO.
3. Respondent agrees not to contest EPA's jurisdiction with respect to the execution of this CA, the issuance of the accompanying Final Order, or the enforcement of the CAFO.
4. For the purposes of this proceeding only, Respondent hereby expressly waives its right to a hearing on any issue of law or fact set forth in this CA and any right to appeal the accompanying Final Order.
5. Respondent shall not deduct for civil taxation purposes the civil penalty specified in this CAFO.
6. Section 22.13(b) of the Consolidated Rules of Practice provides that where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a consent agreement and final order.
7. By signing this CA, Respondent certifies to EPA that, upon investigation and to the best of its knowledge, the Facilities are in compliance with the provisions of the Asbestos

Hazard Emergency Response Act ("AHERA"), Subchapter II of TSCA, 42 U.S.C. §§ 2641-2656, and regulations promulgated thereunder.

8. Respondent consents to the issuance of this CAFO and agrees to comply with its terms.
9. Respondent shall bear its own costs and attorney's fees.
10. Nothing in this CAFO shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations.
11. By signing and executing this CA, Respondent certifies that it has already spent at least one million two hundred thousand dollars (\$1,200,000) since the Maryland Department of the Environment's (MDE) January 30, 2015 inspection for purposes of complying with Subchapter II of TSCA and the regulations promulgated thereunder, in accordance with Section 207(a) of TSCA, 15 U.S.C. § 2647(a), and that Respondent has provided Complainant with all supporting cost documentation and information.
12. This CAFO shall apply to and be binding upon the EPA, Respondent, and the officers, directors, successors, and assigns of Respondent.

III. EPA's Findings of Fact and Conclusions of Law

13. Complainant has determined that Respondent has violated requirements of TSCA and the federal regulations implementing AHERA set forth at 40 C.F.R. Part 763, Subpart E. In accordance with the Consolidated Rules of Practice as set forth at 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3), Complainant alleges the following findings of fact and conclusions of law.
14. Respondent, Prince George's County School District, is the "Local Education Agency" ("LEA") as that term is defined under Section 202(7) of TSCA, 15 U.S.C. § 2642(7) and 40 C.F.R. § 763.83, because it is a public board of education or other public authority

legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or of or for a combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools, and as such, is responsible for ensuring that the Facilities are in compliance with the requirements of AHERA.

15. The Facility, one Ardmore Elementary School building, located at 9301 Arwick-Ardmore Road, Springdale, MD 20774, is a "school" as that term is defined at Section 202(12) of TSCA, 15 U.S.C. § 2642(12) and 40 C.F.R. § 763.83. The school building includes a physically attached addition and modular building, added in 1999 and 2000, respectively.
16. The Facility is a "school building" as that term is defined at Section 202(13) of TSCA, 15 U.S.C. § 2642(13) and 40 C.F.R. § 763.83.

COUNT I

17. The allegations contained in Paragraphs 1 through 16 are incorporated herein by reference.
18. 40 C.F.R. § 763.85(a), requires, *inter alia*, that each LEA shall inspect each school building that they lease, own, or otherwise use as a school building to identify all locations of friable and nonfriable ACBM.
19. On June 21, 1988 Prince George's County School District completed the initial inspection for the Ardmore Elementary School management plan.

20. The inspection conducted by MDE on January 30, 2015 found that Prince George's County School District had not inspected the 1999 addition to Ardmore Elementary School or the modular building addition to Ardmore Elementary School.
21. By failing to perform an inspection for the additions to Ardmore Elementary School, Respondent violated the requirements of 40 C.F.R. § 763.85(a).

COUNT II

22. The allegations contained in Paragraphs 1 through 21 are incorporated herein by reference.
23. 40 C.F.R. § 763.86, provides, *inter alia*, that an accredited inspector collect bulk samples from each homogenous area material, that is not assumed to be ACM, in accordance with the requirements outlined in 40 C.F.R. § 763.86(a) through (d).
24. The inspection conducted by MDE on January 30, 2015 found that Prince George's County School District had not collected bulk samples in accordance with 40 C.F.R. § 763.86 during the inspection for suspected material not assumed to be ACM for the following suspect materials at Ardmore Elementary School: 3" black, brown, beige and 4" navy blue vinyl based cove moldings-mastics, veneer and cores of folding partition walls 30-2 and 24-26, stainless sink undercoatings, rope and woven gasketing on two Hurst boilers, and the navy stage curtain in multi-purpose room.
25. By failing to collect bulk samples, Respondent violated the requirements of 40 C.F.R. § 763.86.

IV. Settlement Recitation

26. Based on the above Findings of Fact and Conclusions of Law, EPA concludes that the Respondent is liable for a civil penalty pursuant to Section 207(a) of TSCA, 15 U.S.C.

§ 2647(a), for violations of TSCA. In full settlement of the violations alleged in this Consent Agreement, in consideration of each provision of this Consent Agreement and the accompanying Final Order, and pursuant to Sections 207(a) and (c) of TSCA, 15 U.S.C. §§ 2647(a) and (c), and other relevant factors, Complainant and Respondent have determined that a civil penalty of six thousand three hundred seventy five dollars (\$6,375) is appropriate.

27. The aforesaid penalty is based upon EPA's consideration of a number of factors, including but not limited to, the statutory factors set forth in Section 207(c) of TSCA, 15 U.S.C. § 2647(c), *i.e.*, the significance of the violation, the culpability of the violator, and the ability of the violator to continue to provide educational services to the community. These factors were applied to the particular facts and circumstances of this case with specific reference to EPA's *Interim Final Enforcement Response Policy for the Asbestos Hazard Emergency Response Act* ("ERP"), dated January 31, 1989, adjusted for inflation pursuant to 40 C.F.R. Part 19.
28. Respondent certifies that it has spent at least one million two hundred thousand dollars (\$1,200,000) since MDE's January 30, 2015 inspection to comply with Subchapter II of TSCA. Therefore, pursuant to Section 16(a)(2)(C) and 207(a) of TSCA, 15 U.S.C. §§ 2615(a)(2)(C) and 2647(a), EPA agrees to the remittance of six thousand three hundred seventy five dollars (\$6,375) of the civil penalty assessed against Respondent.
29. Respondent consents to the assessment of six thousand three hundred seventy five dollars (\$6,375) civil penalty with a cash component of zero dollars (\$0).

V. Reservation of Rights

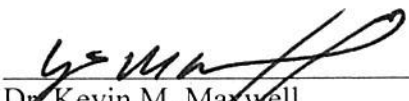
30. This CAFO resolves only the civil claims for the specific violations alleged in this CAFO. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. In addition, this settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice. Further, EPA reserves any rights and remedies available to it under Subchapter II of TSCA, 15 U.S.C. §§ 2641 to 2656, the regulations promulgated thereunder, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this CAFO, following its filing with the Regional Hearing Clerk.

VI. Effective Date

31. The effective date of this CAFO is the date on which the Final Order is filed with the Regional Hearing Clerk pursuant to the Consolidated Rules of Practice. The undersigned representative of Respondent certifies that he or she is fully authorized by Respondent to execute this Consent Agreement and to legally bind Respondent to this Consent Agreement.

For Respondent:


8/11/14
Date



Dr. Kevin M. Maxwell
Chief Executive Officer
Prince George's County Public Schools

For Complainant:

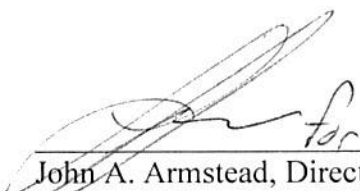
9/15/14
Date



Christine E. Convery, Enforcement Officer
Pesticides and Asbestos Programs Branch

Accordingly, I hereby recommend that the Regional Administrator or his designee issue the Final Order attached hereto.

9/15/14
Date



John A. Armstead, Director
Land and Chemicals Division

**BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III**

IN THE MATTER OF:

**Prince George's County School District
14201 School Lane
Upper Marlboro, MD 20772**

Respondent

EPA Docket No.: TSCA-03-2016-0119

FINAL ORDER

**Proceeding under Sections 16 and 207 of
the Toxic Substances Control Act,
15 U.S.C. § 2615 and 2647(a)**

FINAL ORDER

Complainant, the Director of the Land and Chemicals Division, U.S. Environmental Protection Agency, Region III, and Respondent, Prince George's County School District have executed a document entitled "Consent Agreement", which I hereby ratify as a Consent Agreement in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22 (with specific reference to Sections 22.13(b) and 22.18(b)(2) and (3)). The terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated into this Final Order as if fully set forth at length herein.

Based upon the representation of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of, *inter alia*, EPA's January 1989 *Interim Final Enforcement Response Policy for the Asbestos Hazard Emergency Response Act (AHERA)* and the statutory factors set forth in Section 207(c) of TSCA, 15 U.S.C. § 2647(c).

NOW, THEREFORE, PURSUANT TO Sections 16 and 207 of the Toxic Substances Control Act (TSCA), 15 U.S.C. §§ 2615 and 2647, and 40 C.F.R. § 22.18(b)(3) of the

Consolidated Rules of Practice, **IT IS HEREBY ORDERED** that Respondent is assessed a civil penalty of six thousand three hundred seventy five dollars (\$6,375.00) but that the cash component of that civil penalty will be zero (\$0.00) dollars. In accordance with Section 207(a) of TSCA, 15 U.S.C. § 2647(a), six thousand three hundred seventy five dollars (\$6,375.00) of the civil penalty assessed against the Respondent is hereby remitted.

The effective date of the Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

Sept. 20, 2016
Date



Joseph J. Lisa
Regional Judicial Officer
U.S. Environmental Protection Agency, Region III

**BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103**

IN RE:	:	
	:	
	:	Docket No. TSCA-03-2016-0119
Prince Georges County School District	:	
14201 School Lane	:	
Upper Marlboro, MD 20772	:	
	:	
	:	Consent Agreement and
	:	Final Order
Respondent	:	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on the date provided below, the original and one true and correct copy of the foregoing Consent Agreement and Final Order were hand-delivered to and filed with the Regional Hearing Clerk (3RC30), U.S.EPA - Region III, 1650 Arch Street, Philadelphia, PA, 19103-2029 and that true and correct copies were served Certified U.S. Mail upon the following person:

Dr. Wesley Watts
Chief Operating Officer
Prince George's County School District
14201 School Lane
Upper Marlboro, MD 20772

Date: _____

9/20/16



Ms. Christine Convery
Pesticides/ Asbestos Enforcement Officer
U.S. EPA - Region III

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

Subject: Toxic Substances Control Act
Prince George's County School District
Docket No. TSCA-03-2016-0119
Consent Agreement and Final Order

From: Mary Coe, Regional Counsel
Office of Regional Counsel (3RC00)

John A. Armstead, Director
Land and Chemicals Division (3LC00)

To: Joseph J. Lisa, Regional Judicial Officer
Office of Regional Counsel (3RC00)

The attached Consent Agreement has been negotiated pursuant to the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, and the Revocation/Termination or Suspension of Permits ("Consolidated Rules"), 40 C.F.R. Part 22, with specific reference to 40 C.F.R. § 22.13(b) and .18(b)(2), in settlement of alleged violations of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. §§ 201 *et seq.*, by the Prince George's County School District. A civil penalty of six thousand three hundred seventy five dollars (\$6,375.00) with a cash component of zero dollars (\$0.00) has been calculated in accordance with the statutory factors of TSCA Section 207(c) and EPA's "Interim Final Enforcement Response Policy for the Asbestos Hazard Emergency Response Act (AHERA)", dated January 31, 1989, as supplemented by the "Gravity Based Penalty Matrices for Violations, which occur January 30, 1997, for the AHERA Interim Final ERP" effective January 30, 1997, EPA's September 21, 2004 "Modifications to EPA Penalty Policies to Implement the Civil Monetary Inflation Rule (Pursuant to the Debt Collection Improvement Act of 1996, Effective Date: October 1, 2004)", and EPA's June 5, 2006 "Penalty Policy Supplements Pursuant to the 2004 Civil Monetary Penalty Inflation Adjustment Rule".

TSCA Section 207(a) provides that any civil penalty under AHERA from a local education agency ("LEA") be reduced by the LEA's costs spent complying with AHERA requirements. Following Maryland Department of Environment's January 2015 inspection, the LEA in this case documented costs to comply with AHERA and, therefore, the cash component of the assessed civil penalty is zero dollars (\$0.00). This is consistent with the "Assessing Administrative Civil Penalties Against an LEA" section of the 1989 Interim Final Enforcement Response Policy for AHERA.

We concur with the terms of the attached Consent Agreement and we recommend that you sign the Final Order, in accordance with the Consolidated Rules at 40 C.F.R. § 22.18(b)(3).

Attachments

cc: Dr. Wesley Watts, Chief Operating Officer
Prince George's County Public Schools
14201 School Lane
Upper Marlboro, MD 20772
wesley.watts@pgcps.org